



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
LAKE COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 02-12769**

**Fac ID: 0243011322**

**DATE: 5/31/2005**

PCC Airfoils, Inc.  
Jeffrey A. Thomas  
29501 Clayton Rd.  
Wickliffe, OH 44092

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 5/31/2005  
Effective Date: 5/31/2005**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-12769**

Application Number: 02-12769  
Facility ID: 0243011322  
Permit Fee: **\$200**  
Name of Facility: PCC Airfoils, Inc.  
Person to Contact: Jeffrey A. Thomas  
Address: 29501 Clayton Rd.  
Wickliffe, OH 44092

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**34300 Melinz Parkway  
Eastlake, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to PTI 02-12769 to change the MACT requirements.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

PCC Airfoils, Inc.

PTI Application: 02-12769

Modification Issued: 5/31/2005

Facility ID: 0243011322

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of

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up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	1.8

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L001 - Open top vapor degreaser using trichloroethylene. Modification to Synthetic Minor PTI #02-12769, issued on July 8, 1999.	OAC rule 3745-31-05(A)(3)	The requirements of this rule include compliance with the requirements established under 40 CFR Part 63, Subpart T.
	40 CFR Part 63, Subpart T	Emissions of organic compounds (OC) shall not exceed 298 lbs OC/rolling 3-month average and 1.8 tons OC/rolling 12 month period.
	OAC rule 3745-21-09(O)	See A.2.a. below.

**2. Additional Terms and Conditions**

- 2.a In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(3) shall not apply to this emissions unit.

**B. Operational Restrictions**

1. The maximum annual solvent usage for this emissions unit shall not exceed 295 gallons per rolling, 12-month period.

**C. Monitoring and/or Record Keeping Requirements**

1. On the first operating day of every month, the permittee shall ensure that the solvent cleaning

**PCC Airfoils, Inc.**

**PTI Application: 02-12760**

**Modif**

**Facility ID: 0243011322**

Emissions Unit ID: **L001**

machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine

must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified below. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

2. The permittee shall collect and record each month the following information:
  - a. the dates and total amount of solvent added to the solvent cleaning machine, in gallons/month;
  - b. the dates and total amount of solvent removed from the solvent cleaning machine, in gallons/ month;
  - c. the total amount of solvent removed from the solvent cleaning machine in solid waste, as determined using the procedure described in 40 CFR Part 63.465(c)(2), in lbs/month;
  - d. the total solvent emissions from the solvent cleaning machine using the following equation:

$$E_i = (S_{Ai} - LSR_i - SSR_i)$$

where:

$E_i$  = the total solvent emissions from the solvent cleaning machine during the most recent monthly reporting period  $i$ , in lbs/month;

$S_{Ai}$  = the total amount of solvent added to the solvent cleaning machine during the most recent monthly reporting period  $i$ , in lbs/month (calculated by multiplying gal/month by density of the solvent);

$LSR_i$  = the total amount of solvent removed from the solvent cleaning machine during the most recent monthly reporting period  $i$ , in lbs/month (calculated by multiplying gal/month by density of the solvent); and

$SSR_i$  = the total amount of solvent removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period  $i$ , as determined using the procedure described in 40 CFR Part 63.465(c)(2), in lbs/month.

- e. the monthly rolling average solvent emissions for the 3-month period ending with the most recent reporting period, in lbs/month; and

- f. the annual solvent emissions, in tons, based upon a rolling, 12-month summation of the monthly solvent emissions.

#### **D. Reporting Requirements**

1. The permittee shall maintain the following records, either in electronic or written form for a period of five years:
  - a. the dates and amount of solvent that are added to the solvent cleaning machine;
  - b. the solvent composition of wastes removed from cleaning machines as determined using tests conducted using EPA reference method 25d, or by engineering calculations included in the compliance report; and
  - c. calculation sheets showing how monthly emissions and the rolling 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations.
2. The permittee shall submit an annual solvent emission report by February 1 of each year for the preceding year. This solvent emission report shall contain the following information:
  - a. the size and type of each unit subject to this subpart (solvent/air interface area or cleaning capacity);
  - b. the average monthly solvent consumption for the solvent cleaning machine, in lbs/month; and
  - c. the 3-month monthly rolling average solvent emissions, in lbs/month.
3. The permittee shall submit an exceedance report semiannually except when, the OEPA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information specified below:

- a. any information on the action taken to comply with 40 CFR Part 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels;
  - b. if an exceedance has occurred, the reason for the exceedance and a description of the actions taken; and
  - c. if no exceedance of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
4. If the permittee is required to submit an exceedance report on a quarterly (or more frequent) basis, the permittee may reduce the frequency of reporting to semiannual if the following conditions are met:
- a. the source has demonstrated a full year of compliance without an exceedance;
  - b. the owner or operator continues to comply with all relevant record keeping and monitoring requirements specified under 40 CFR Part 63, Subpart A (General Provisions); and
  - c. the OEPA does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of 40 CFR Part 63, Subpart A (General Provisions).
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month solvent usage restriction.

## **E. Testing Requirements**

1. Compliance with the allowable emissions limitations in Section A.1. and A.2. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 298 lbs of OC per rolling 3-month average.  
  
Applicable Compliance Method: The permittee shall demonstrate compliance based on the record keeping required in Section C.2. of these terms and conditions.
  - b. Emission Limitation: 1.8 tons of OC (trichloroethylene) per rolling twelve-month period.

**PCC /**

**PTI A**

**Modification Issued: 5/31/2005**

Emissions Unit ID: **L001**

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping required in Section C.2. of these terms and conditions.

**F. Miscellaneous Requirements**

The terms and conditions contained in this PTI, A.1 through E.1, are federally enforceable.