

X Synthetic Minor Determination and/or Netting Determination
Permit To Install **02-18148**

A. Source Description:

Replacement vapor degreaser using trichloroethylene

B. Facility Emissions and Attainment Status:

Lorain County is an attainment county. Facility is currently denoted as a Title V facility because of, 40 CFR, Part 63, Subpart T. Facility can opt out of Title V by taking restrictions on potential emissions.

C. Source Emissions:

Emissions unit potential to emit is calculated from 40 CFR, Part 63, Subpart T. With emission restrictions, emissions unit allowable is 4.20 TPY.

D. Conclusion

When PTI is issued, the facility will no longer be subject to Title V permitting.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
LORAIN COUNTY

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-18148

DATE: 8/5/2003

Ohio Screw Products, Inc.
Daniel Imbrogno
818 Lowell Street
Elyria, OH 44036

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **02-18148** FOR AN AIR CONTAMINANT SOURCE FOR
OHIO SCREW PRODUCTS, INC.

On 8/5/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ohio Screw Products, Inc.**, located at **818 Lowell Street, Elyria**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-18148:

Vapor degreaser.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-18148

Application Number: 02-18148
APS Premise Number: 0247040393
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ohio Screw Products, Inc.
Person to Contact: Daniel Imbrogno
Address: 818 Lowell Street
Elyria, OH 44036

Location of proposed air contaminant source(s) [emissions unit(s)]:
**818 Lowell Street
Elyria, Ohio**

Description of proposed emissions unit(s):
Vapor degreaser.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

Issued: To be entered upon final issuance

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

5. 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 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.

6. 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.

7. 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.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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>
Organic compounds	4.20

13

Ohio Screw Products, Inc.

PTI Application: 02-18148

Issued: To be entered upon final issuance

Facility ID: 0247040393

Ohio Screw Products, Inc.

Facility ID: 0247040393

PTI Application: 02-18148

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
L003 - Vapor degreaser using Trichloroethylene	OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 0.96 pounds per hour.
	OAC rule 3745-21-09(O)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and 40 CFR, Part 63, Subpart T.
	40 CFR, Part 63, Subpart T	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. (See A.I.2.b.)
	OAC rule 3745-35-07(B)	See sections A.2.a and A.2.b.
		Organic compound emissions shall not exceed 4.20 tons per year.*
		* = compliance with this annual allowable is based on a rolling 12-month average.
		See sections A.2.c.

2. Additional Terms and Conditions

Issued: To be entered upon final issuance

- 2.a** The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
- i. Use an idling and downtime mode cover and ensure that the cover opens only for part entrance and removal, that it may be readily opened or closed, that it completely covers the solvent cleaning machine openings when in place, and that it is free of cracks, holes, and other defects; or, use a reduced room draft that ensures that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Record Keeping Requirements" section of this permit. (The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Record Keeping Requirements" section of this permit.)
 - ii. The solvent cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts basket at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - iv. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils or rises above the height of the primary condenser.
 - v. The solvent cleaning machine shall have a primary condenser.
- 2.b** This rule citation reflects the new exemption added to OAC rule 3745-21-09(O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. USEPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for ozone.
- 2.c** The annual limit of organic compounds is sufficient to effectively limit HAPs to below Title V thresholds.

II. Operational Restrictions

Ohio Screw Products, Inc.
PTI Application: 02-10140
Issued

Facility ID: 0247040393

Emissions Unit ID: L003

1. If a superheated vapor system is used, the permittee shall ensure the following:
 - a. the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees Fahrenheit above the solvent's boiling point;
 - b. the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed;
 - c. that parts remain within the superheated vapor for at least the minimum dwell time.

Issued: To be entered upon final issuance

2. The permittee shall meet all of the following required work and operational practices:
 - a. air disturbances across the solvent cleaning machine opening(s) shall be controlled by ensuring that the cover(s) to the solvent cleaning machine shall be in place during the idling mode and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place;
 - b. the parts basket or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less;
 - c. any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine);
 - d. parts shall be orientated so that the solvent drains from them freely (parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA, NEDO);
 - e. parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped;
 - f. during startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater;
 - g. during shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
 - h. when solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
 - i. the solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA NEDO to achieve the same or better results as those recommended by the manufacturer;
 - j. the permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR part 63, Appendix B if requested during an inspection by

Issued: To be entered upon final issuance

the Ohio EPA NEDO;

- k. waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container; and

Emissions Unit ID: L003

1. sponges, fabric, wood, and paper products shall not be cleaned in this emissions unit.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed 4.2 tons per 12 month rolling period of organic material in solvent evaporated. During the first 12-months of operation, the limits specified in the following table apply:

Month(s)	Maximum Allowable Cumulative organic material evaporation (Tons)
0-1	0.35
1-2	0.70
1-3	1.05
1-4	1.40
1-5	1.75
1-6	2.10
1-7	2.45
1-8	2.80
1-9	3.15
1-10	3.50
1-11	3.85
1-12	4.20

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions. The organic material evaporation shall be calculated monthly using the following equation:

$$\text{Organic Material Evaporated} = \frac{\text{Summation [(Gallons of solvent evaporated} \times \text{organic content density in solvent (lbs per gallon)) for all calendar months]} \times 1 \text{ ton per 2000 pounds}}{2000}$$

III. Monitoring and/or Record keeping Requirements

1. If the reduced room draft is maintained by controlling room parameters, the permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as outlined below:
 - a. measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - i. determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
 - ii. orient a velometer in the direction of the wind current at each of the four corners of the machine;

Issued: To be entered upon final issuance

- iii. record the reading for each corner;
 - iv. average the values obtained at each corner and record the average wind speed; and
 - b. monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
2. If an enclosure (full or partial) is used to achieve a reduced room draft, the owner or operator shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedures below and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects:
 - a. determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until maximum speed is located; and
 - b. record the maximum wind speed.
3. The permittee shall conduct monitoring and record the results on a weekly basis for the superheated vapor system by using a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in idling mode.
4. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute). The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin to monitor the hoist speed quarterly. If an exceedance of the hoist speed occurs during the quarterly monitoring, the monitoring frequency shall return to monthly until another year of compliance without an exceedance is demonstrated.
5. The permittee shall maintain records of the following either in electronic or written form for a period of 5 years:
 - a. the results of control device monitoring;
 - b. information on the action taken to comply with the Operational Restrictions of this permit (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);
 - c. estimates of annual solvent consumption for each solvent cleaning machine; and

Emissions Unit ID: L003

- d. estimates of the hours that the solvent cleaning machine was operating.
6. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
- a. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
 - b. the date of installation for the solvent cleaning machine and all of its control devices (if the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted); and
 - c. records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
7. The permittee shall record each month the following:
- a. the amount of solvent added to the solvent cleaning machine, in gallons (if no solvent was added, the record should state such);
 - b. the number of hours that the solvent cleaning machine was in operation; and
 - c. the average hourly OC emission rate, in lbs/hr, calculated in accordance with the equation in A.V.2 .
8. The permittee shall maintain monthly records of the following information:
- a. the number of gallons of solvent loss to evaporation (solvent loss minus solvent recovered);
 - b. the organic content density in solvent evaporated (in pounds per gallon);
 - c. For the first 12 calendar months following the startup of the emissions unit L003, the cumulative organic material evaporation calculated by adding the current month's organic material evaporation (using the equation in B.3) for each calendar month since the startup of the emissions unit L003.
 - d. Beginning after the first 12 calendar months following the startup of the emissions unit L003, the 12-month rolling summation of organic material evaporation calculated by adding the current month's organic material evaporation to the organic material evaporation for the preceding eleven calendar months.

IV. Reporting Requirements

1. The permittee shall submit an initial notification report to the Ohio EPA. This report shall include

23

Ohio §

PTI A

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the following information:

Emissions Unit ID: L003

Issued: To be entered upon final issuance

- a. The name and address of the owner or operator.
 - b. The address (i.e physical location) of each solvent cleaning machine.
 - c. A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls.
 - d. The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine and its control devices were installed prior to, or after November 29, 1993.
 - e. The anticipated compliance approach for each solvent cleaning machine.
 - f. An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
2. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
 - a. a signed statement from the facility owner or the owner's designee stating that "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required to 40 CFR Part 63.643(d)(10)";
 - b. an estimate of solvent consumption during the reporting period;
 - c. an estimate of hours that the solvent cleaning machine was in operation during the reporting period; and
 - d. the total OC emissions, in tons, calculated in accordance with the equation in A.V.3 .
 3. The permittee shall submit an exceedance report on a semiannual basis. If the manufacturer's specification for determining the minimum dwell time within the superheated vapor system was not followed and/or parts did not remain within the vapor zone for at least the minimum proper dwell time and/or if the temperature of the solvent vapor at the center of the superheated vapor zone was less than 10 degrees Fahrenheit above the solvent's boiling point, and correction was not made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Northeast District Office of the Ohio EPA.
 4. The permittee shall submit a wind speed exceedance report on a semiannual basis. If no operation

Emissions Unit ID: L003

conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA, Northeast District Office.

5. The permittee shall submit to the Ohio EPA Northeast District Office an initial statement of compliance for each solvent cleaning machine. This report shall be submitted no later than 150 days after start-up. The initial statement of compliance shall include the following:
 - a. the name and address of the permittee;
 - b. the address (i.e physical location) of the solvent cleaning machine;
 - c. a list of the control equipment used to achieve compliance for each solvent cleaning machine;
 - d. for each piece of control equipment to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date; and
 - e. conditions to maintain the wind speed requirements.

6. The permittee shall submit deviation (excursion) reports which include the following information on emissions unit L003:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 0.96 pounds per hour; and,
 - b. All exceedances of the 12-month rolling organic material evaporation operation restriction and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative organic material evaporation.

V. Testing Requirements

1. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:
 - a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i \quad \text{Where:}$$

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$PTE_i =$ the potential to emit for the solvent cleaning machine i (kilograms solvent per year).

$H_i =$ hours of operation for solvent cleaning machine i (hours per year), 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i =$ the working mode uncontrolled emission rate (kilograms per square meter per hour), 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines, 1.12 kilograms per square meter per hour for in-line cleaning machines.

$SAI_i =$ solvent/air interface area of solvent cleaning machine i (square meters). 40 CFR, Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6} \quad \text{Where:}$$

$SAI =$ the solvent/air interface area (square meters).

$Vol =$ the cleaning capacity of the solvent cleaning machine (cubic meters).

- c. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

2. Emission Limitation: 0.96 pounds of organic compounds per hour

Applicable Compliance Method: Compliance with the hourly emission limitation shall be determined by the following equation:

$$ER = G \times SD/H \quad \text{where}$$

$ER =$ emission rate (pounds per hour)

$G =$ gallons of solvent used per month (as required by Monitoring and/or Record Keeping Requirement 7.a)

Ohio Screw Products, Inc.
PTI Application: 02-10140
Issued

Facility ID: 0247040393

Emissions Unit ID: L003

SD = solvent density (pounds per gallon)

H = hours of operation (hours per month) (as required by Monitoring and/or Record Keeping Requirement 7.b)

3. Emission Limitation: 4.20 tons of organic compounds per rolling 12 month period.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in C.8.

Ohio Screw Products, Inc.
PTI Application: 02 10140
Issued

Facility ID: 0247040393

Emissions Unit ID: L003

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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>
L003 - Vapor degreaser using Trichloroethylene	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit L003 was evaluated based on the actual materials (typically coatings and cleanup material) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Trichloroethylene

TLV (mg/m3): 268.71

Maximum Hourly Emission Rate (lbs/hr): 0.96

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 90.26

MAGLC (ug/m3): 6.39×10^3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still

satisfies the "Air Toxic Policy"; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None