Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

9/28/2011

Certified Mail

Mr. David Clucas
Astro Model Development
34459 Curtis Blvd
Eastlake, OH 44095

Facility ID: 0243011367
Permit Number: P0084904
County: Lake

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northeast District Office

Ohio | Environmental Protection Agency

# FINAL

# Division of Air Pollution Control
# Title V Permit
for
Astro Model Development

| | |
|---|---|
| Facility ID: | 0243011367 |
| Permit Number: | P0084904 |
| Permit Type: | Initial |
| Issued: | 9/28/2011 |
| Effective: | 10/19/2011 |
| Expiration: | 10/19/2016 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
Astro Model Development

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# Authorization

Facility ID: 0243011367
Facility Description: Mfg. of machine tools
Application Number(s): A0015494, A0015495, A0015496
Permit Number: P0084904
Permit Description: This is an initial Title V permit for 4 coating lines and 1 trichloroethylene degreaser.
Permit Type: Initial
Issue Date: 9/28/2011
Effective Date: 10/19/2011
Expiration Date: 10/19/2016
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Astro Model Development
34459 Curtis Blvd
Eastlake, OH 44095

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. 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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. 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, in accordance with Standard Term and Condition A.11 below. 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; ora combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. 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.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(1) 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.

(2) 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 paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)

**25. Records Retention RequirementsUnder State Law Only**

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.

**26. 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.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. 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).

**28. 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.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart T: L001. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://efcr.gpoaccess.gov (http://efcr.gpoaccess.gov/) or by contacting the Ohio EPA Northeast District Office.

# C. Emissions Unit Terms and Conditions

**1. L001**

**Operations, Property and/or Equipment Description:**

Batch Vapor Degreaser with Trichloroethylene solvent

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (L001) - Baron Blakesly open top batch vapor degreaser with rinsing tanks using trichloroethylene equipped with a cover and a refrigerated chiller.**

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-22421 issued on 11/27/07) | Volatile organic compounds (VOC - trichloroethylene) emissions shall not exceed 1.72 lbs/hr and 7.55 tons per year.<br><br>See d)(5). |
| b. | OAC rule 3745-21-09(O)(6)(b) | exempt<br><br>See b)(2)a. |
| c. | 40 CFR Part 63, Subpart T | See b)(2)a and b)(2)b. |

(2) Additional Terms and Conditions

a. After June 15, 1999, paragraphs (O)(2) to (O)(5) of OAC rule 3745-21-09(O) shall not apply to any solvent metal cleaning operation which is subject to Subpart T of 40 CFR Part 63, provided the requirements of Subpart T are specified in the terms and conditions of a permit to install (PTI) or a permit to install and operate (PTIO) issued pursuant to OAC rule 3745-31-02(A), or a Title V operating permit issued pursuant to OAC rule 3745-77-08.

b. The batch vapor cleaning machine, having a solvent/air interface area greater than 1.21 square meters (13 square feet), shall employ a freeboard refrigeration device, a freeboard ration of 1.0 or greater and superheated vapor, as the

chosen control combination selected from Table 2 of Subpart T [40 CFR 63.463(b)].

c. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:

i. The vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.

ii. The vapor cleaning machine shall have a primary condenser.

iii. The vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

iv. The permittee shall use an idling and downtime mode cover, that shall be in place during the idling mode and during the downtime mode, unless: (a) *the solvent has been removed*, (b) *solvent is being added or removed, or (c)* maintenance, monitoring, *and/or solvent level measurements is/are* being performed that requires the cover(s) to be removed.

c) Operational Restrictions

(1) The permittee shall control air disturbances across the solvent cleaning machine by using an idling and downtime mode cover, that shall be in place during the idling and downtime modes, unless: (a) the solvent has been removed, (b) solvent is being added or removed, or (c) maintenance, monitoring, and/or solvent level measurements is/are being performed that requires the cover(s) to be removed. The cover shall be able to be readily opened or closed, shall completely cover the cleaning machine openings when in place, and shall be free of cracks, holes and other defects. A continuous web part that completely occupies an entry or exit port when the machine is idle is considered to meet this requirement.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart T]

(2) The permittee shall meet the following required work and operational practices:

a. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

b. 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.

c. 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.

d. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment; or maintained using

alternative maintenance practices that have been demonstrated to the satisfaction of the regulating agency (appropriate Ohio EPA District Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.

e. 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 must not allow liquid solvent to drain from the container.

f. Sponges, fabric, wood, paper products and/or other porous or absorbent material shall not be cleaned.

g. The solvent cleaning machine s automated parts handling system shall move the parts or parts baskets at a speed not to exceed 3.4 meters per minute (11 feet per minute, hoist speed).

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart T]

(3) The permittee shall meet all of the following required work and operational practices:

a. 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).

b. Parts shall be oriented 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 regulating agency.

c. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart T]

(4) The permittee shall conduct periodic monitoring of the parameters used to demonstrate compliance, as described in the "*Monitoring and Record keeping Requirements*" section of this permit; and these parameters shall meet the requirements established in this permit.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart T]

(5) The permittee shall ensure that the chilled air blanket temperature, measured at the center of the air blanket, is no greater than 30 percent of the solvent s boiling point.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart T]

(6) The permittee shall ensure that the cover is in place whenever parts are not in the solvent cleaning machine and it completely covers the cleaning machine openings during downtime and during the idling mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements is/are being

conducted. The permittee shall ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart T]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification, if applicable, of each solvent employed;

b. the density of each solvent employed, in lbs per gallon;

c. the number of gallons of each solvent employed for each day;

d. the total VOC emissions from all solvents for each day, in pounds and tons per day; and

e. the total VOC emissions from all solvents, to date, in tons per month

Control reduction efficiencies shall be applied based on the following from the Radian Document, May 26, 1993, A-92; II-B-92 Summary:

| | |
|---|---|
| E1 = Freeboard ratio of one or greater | 20% reduction; |
| E2 = Freeboard refrigeration device | 40% reduction; and |
| E3 = Superheated Vapor | 50% reduction. |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T and OAC rule 3745-31-05(A)(3)]

(2) Using a thermometer or thermocouple, the permittee shall measure and record, on a weekly basis, the temperature at the center of the air blanket during the idling mode.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(3) The permittee shall measure and record the freeboard ratio before each solvent addition to assure compliance with the control requirement limitation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(4) The permittee shall comply with the following requirements:

Freeboard refrigeration device

a. ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10$^{o}$F above the solvent's boiling point;

Freeboard ratio

b. ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed; and

Superheated vapor system

c. ensure that parts remain within the superheated vapor for at least the minimum proper dwell time.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(5) The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(6) The permittee shall conduct a monthly visual inspection of the idling-mode/downtime cover(s) and shall maintain a record of the results. The records shall document that the cover is opening and closing properly, that it completely covers the cleaning machine openings when closed, and is free of cracks, holes and other defects.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(7) The permittee shall monitor the hoist speed as described below and maintain records of the results:

a. 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).

b. The permittee shall document that the parts and parts basket does not occupy more than 50 percent of the solvent/air interface area, if the hoist speed exceeds 0.9 meters per minute (3 feet per minute). This determination shall be re-calculated if the parts or basket size increases.

c. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.

d. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.

e. If the permittee can demonstrate in the initial compliance report, and to the satisfaction of the regulating agency, that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency may be quarterly, including during the first year of compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(8) 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. records of the halogenated HAP trichloroethylene solvent content for each solvent used in the solvent cleaning machine;

c. the date of installation for the solvent cleaning machine and all of its control device.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(9) The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:

a. the results of the control device monitoring required in this permit;

b. information on the actions taken to comply with 40 CFR 63.463, including the control equipment, the required monitoring parameters, records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels;

c. estimates of annual solvent consumption for the solvent cleaning machine.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(10) The permittee shall maintain a record of any malfunction of the following control equipment, during which time the machine was/is not shut down until repaired:

a. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;

b. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or

c. the primary condenser.

Included in the record shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(11) The hourly VOC emissions limitation of lbs per hour is based on the maximum potential to emit determined in the testing section of these terms and conditions. Therefore , no monitoring or record keeping is required to demonstrate compliance with the hourly limit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

e) Reporting Requirements

(1) The following information is to be submitted with/in the permit application as a requirement of the Initial Notification Reporting in this subpart. This information would need to be submitted before a permit could be issued and therefore would not appear as a term in the permit:

a. the name and address of the permittee;

b. a notification of intention to construct a new major affected source;

c. the address (i.e., physical location) of the solvent cleaning machine;

d. an identification of all the relevant standards applicable to the solvent cleaning machine

e. an expected completion date of construction or reconstruction, or the date of installation, if installed;

f. the anticipated startup date of the solvent cleaning machine;

g. the type and quantity of hazardous air pollutants expected to be emitted by the unit;

h. a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), the solvent(s), the solvent/air interface area, and existing controls

i. the anticipated compliance approach for the solvent cleaning machine; and

j. an estimate of the annual halogenated HAP solvent consumption for the solvent cleaning machine and annual estimated HAP emissions with records for any recovered materials; if an existing facility, these estimates shall be based on existing purchasing records of solvent usage.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(2) The permittee shall submit an annual report by February 1 of each year, following the year for which the report is being made. This report shall contain the following information:

a. a signed statement, by the facility owner or his designee, stating that all operators of the solvent cleaning machine have received training on the proper operation of solvent cleaning machines and their control devices, sufficient to pass the testing required by the standard; and

b. an estimate of solvent consumption during the reporting period and emissions of each HAP.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(3) The permittee shall submit a quarterly deviation report if monthly (or quarterly if adjusted after the first year) measurements and records are not maintained of the speed of the solvent cleaning machine's automated parts handling system, or if these measurements exceed 3.4 meters per minute (11.0 feet per minute).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(4) The permittee shall submit an exceedance report on a semiannual basis, unless it is determined that more frequent reporting is necessary to accurately assess compliance or if an exceedance occurs. Once an exceedance has occurred, the permittee shall submit quarterly exceedance reports, until such time that the permittee requests and receives approval from the regulating agency of less frequent reporting requirements. The permittee may receive approval of less frequent reporting if the following conditions are met:

a. the emissions unit has demonstrated a full year of compliance without an exceedance;

b. the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions; and

c. the regulating agency does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR 63.1, General Provisions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(5) The permittee shall submit a deviation report if the cover did not completely cover the cleaning machine openings, when containing the HAP solvent and during any idling or downtime mode, unless solvent is being added or removed, and/or maintenance, monitoring, and/or solvent level measurements were being conducted. Cracks, holes or other defects to the cover, that were not repaired or the cover not replaced within 15 days of detection, shall also be reported.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(6) The permittee shall submit a deviation report 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 was not corrected within 15 days of detection.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(7) The permittee shall submit a deviation report if the temperature of the chilled air blanket, measured at its center, was greater than 30% of the solvent's boiling point and was not adjusted within 15 days of detection.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(8) The permittee shall submit a deviation report if the freeboard ratio is not maintained at 1.0 or greater.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(9) Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following information:

a. if an exceedance has occurred, the standard, monitored parameter, emission limit, or other requirement that was exceeded; the reason for the exceedance; and the actions taken to correct any future exceedance of the same limit or requirement;

b. action(s) taken to comply with 40 CFR 63.463 (e) and (f) including 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 acceptable levels; and

c. if no exceedance has occurred, a statement to that effect shall be submitted.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(10) The permittee shall submit quarterly deviation reports if any of the following control equipment is not repaired or replaced within 15 days of any malfunction, and/or the machine is not shut down until repaired:

a. the device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;

b. the vapor level control device(s) that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser, if the condenser coolant is not circulating, or if the coolant is too warm; and/or

c. the primary condenser.

Included in the report shall be the length of time the equipment was not in operation or malfunctioning, and the date it was repaired or replaced.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(11) The permittee shall submit an annual solvent emission report by February 1 of each year, which shall cover the previous calendar year, and shall contain the following information:

a. the size and type of the solvent cleaning machine, including if it has a solvent/air interface area or is using cleaning capacity;

b. the average monthly solvent consumption for the solvent cleaning machine in kilograms and pounds per month; and

c. the 3-month monthly rolling average HAP emission estimates, calculated each month using the method as described in the standard and/or the "*Testing Requirements*" section of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

f) Testing Requirements

(1) Compliance with the emission limitations and control requirements in the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC (trichloroethylene) emissions shall not exceed 1.72 lbs/hr and 7.55 tons per year.

Applicable Compliance Method:

To determine the annual VOC emission rate, the following equation shall be used:

E = (Ls-Lw) x D/2000

where:

E = VOC emission rate (tons/year);

Ls = liquid volume of cleaning solvent employed each year (gallons);

Lw = liquid volume of cleaning solvent sent off-site as waste (gallons); and

D = density of cleaning solvent (pounds/gallon).

If more than one type of cleaning solvent is employed, the above equation shall be used for each cleaning solvent. The total annual VOC emissions rate shall be determined by the summation of the annual organic compound emission rates for all cleaning solvents.

Control reduction efficiencies shall be applied based on the following from the Radian Document, May 26, 1993, A-92; II-B-92 Summary:

E1 = Freeboard ratio of one or greater 20% reduction;

E2 = Freeboard refrigeration device 40% reduction; and

E3 = Superheated Vapor 50% reduction.

Compliance with the short term emission limit of 1.72 lbs per hour shall be assumed as long as compliance with the annual limit is demonstrated and maintained.

b. Control Requirement:

The permittee has installed and shall employ working-mode cover, a freeboard refrigeration device, freeboard ratio of 1.0 and superheated vapor, as the control combination required from Table2 and 3, found in 40 CFR 63.463.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the selected control combination from Table 2 and 3**,** through compliance with the Additional Terms and Conditions, Operational Restrictions, and Monitoring and Recordkeeping Requirements and Testing Requirement sections of this permit.

c. Control Requirement:

The chilled air blanket temperature measured at the center of the air blanket shall be no greater than 30% of the solvents boiling point.

Applicable Compliance Method:

The solvents boiling point shall be documented and, on a weekly basis, the permittee shall measure the temperature at the center of the air blanket during the idling mode using a thermometer or thermocouple.

d. Control Requirement:

The temperature of the solvent vapor at the center of the superheated vapor zone shall be at least 10 degrees F above the solvents boiling point.

Applicable Compliance Method:

The solvents boiling point shall be documented and, on a weekly basis, the permittee shall measure the temperature at the center of the superheated solvent vapor zone during the idling mode using a thermometer or thermocouple. The proper dwell time shall be determined and measured using the manufacturers specifications for determining and employing the minimum proper dwell time.

e. Control Requirement:

The freeboard ratio shall not exceed 1.0

Applicable Compliance Method:

The permittee shall measure and record the freeboard ratio before and after each solvent addition to assure compliance with the control requirement limitation.

f. Control Requirement:

The hoist speed shall not exceed 3.4 meters per minute (11 feet per minute)**.**

Applicable Compliance Method:

The permittee shall determine the hoist speed by measuring the time it takes for the hoist, part, or part basket to travel a measured distance, and at the frequency as required in the Monitoring and Record keeping Requirements section of this permit. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

(2) The permittee shall determine the facility s potential to emit (PTE) from all solventcleaning 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 for each emissions unit 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:

PTEi = Hi X Wi X SAIi

where:

PTEi = the potential to emit for the solvent cleaning machine i (kilograms solvent per year)

TPY limit = PTEi X 0.0011023

Hi = hours of operation for solvent cleaning machine i (hours per year)

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement

Wi = 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 solvent cleaning machines

SAIi = solvent/air interface area of solvent cleaning machine i (square meters).

Control reduction efficiencies shall be applied based on the following from the Radian Document, May 26, 1993, A-92; II-B-92 Summary:

E1 = Freeboard ratio of one or greater 20% reduction;
E2 = Freeboard refrigeration device 40% reduction; and
E3 = Superheated Vapor 50% reduction.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart T]

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group -Spray Booths (units 1 – 4) : K001, K002, K003, K004,**

The following terms and conditions apply to each identical emissions unit contained in the following table.

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| K001 | **Spray Booth #1 -** Plastic and miscellaneous metal parts bench style coating spray booth # 1 with 2 natural gas ovens rated at 600,000 and 700,000 BTU/hr and electrostatic air spray gun |
| K002 | **Spray Booth #2 -** Plastic and miscellaneous metal parts bench style coating spray booth # 2 with 2 natural gas ovens rated at 600,000 and 700,000 BTU/hr and electrostatic air spray gun |
| K003 | **Spray Booth #3 -** Plastic and miscellaneous metal parts bench style coating spray booth # 3 with 2 natural gas ovens rated at 600,000 and 700,000 BTU/hr and electrostatic air spray gun |
| K004 | **Spray Booth #4 -** Plastic and miscellaneous metal parts bench style coating spray booth # 4 with 2 natural gas ovens rated at 600,000 and 700,000 BTU/hr and electrostatic air spray gun |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 02-22421 issued on 11/27/2007) | Volatile organic compound (VOC) emissions resulting from the use of all coatings, additives and thinners in this emissions unit shall not exceed 0.80 pound per hour, 20.0 pounds per day and 3.7 tons per year, including cleanup.<br><br>See b)(2)b. |
| b. | OAC rule 3745-21-07(G)(2) | The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).<br><br>See b)(2)c. |

| | | |
|---|---|---|
| c. | OAC rule 3745-21-09(U)(2)(e) | The material usage restriction required by this applicable rule is less stringent than the material usage restriction established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

a. This coating line is not subject to 40 CFR Part 63, Subpart PPPP (Plastic Parts Coating MACT) or 40 CFR Part 63, Subpart MMMM (Miscellaneous Metal Coating MACT) because the facility-wide potential to emit for hazardous air pollutants (HAPs) after controls is less than major source thresholds.

b. The permittee shall not employ more than 3 gallons per day of coating material for the coating of miscellaneous metal and plastic parts.

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of state regulations. On April 4, 2008, the rule revision was submitted to USEPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following term and condition shall become void after the U.S. EPA approves the rule revision: b)(1)b.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating employed;

b. the name and identification number of each additive, thinner and cleanup material;

c. the VOC content of each coating employed, in pounds per gallon, as applied;

d. the VOC content of each additive, thinner and cleanup material, in pounds per gallon, as applied;

e. the number of gallons of each coating employed;

f. the total number of gallons of all coatings employed (must be less than 3 gallons/day);

g. the number of gallons of each additive, thinner and cleanup material;

h. the total VOC emissions from all the coatings employed, in pounds [i.e., the sum of (c) times (e) of each coating employed];

i. the total VOC emissions from all additives, thinners and cleanup materials, in pounds [i.e., the sum of (d) times (g) for each additive, thinner and cleanup material];

j. the total VOC emissions from the coating line, in pounds per day [(h) + (i)];

k. the total operating hours of the coating line;

l. the average hourly VOC emission rate from the coating line, in lbs per hour [(j)/(k)].

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each month for this emissions unit:

a. the cumulative/total VOC emissions from the coating line, in pounds or tons per month [summation of (j)]; and

b. the actual VOC emissions, in tons, from all coatings, additives, thinners, and cleanup materials for the previous 12-month period, i.e. the rolling 12-month summation.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that this coating line employed more than the applicable maximum daily coating usage limit of 3 (three) gallons per day. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports, in writing, that identify each day during which the average hourly, daily and/or annual emission limitations for VOC exceeded 0.80 pound per hour, 20.0 pounds per day and 3.7 tons per year, respectively, and the actual average hourly, daily and/or annual VOC emissions for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit annual compliance reports that include the actual VOC emissions for the calendar year in tons per year.

The reports shall be submitted to the Ohio EPA Northeast District Office by February 1 of each year and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations and usage restriction in sections b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Usage Restriction:

The permittee shall not employ more than 3 gallons per day of coating material for the coating of miscellaneous metal and plastic parts.

ApplicableCompliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)f.

b. Emission Limitation:

VOC emissions resulting from the use of all coatings, additives and thinners in this emissions unit shall not exceed 0.80 pound per hour, including cleanup.

ApplicableCompliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)l.

c. Emission Limitation:

VOC emissions resulting from the use of all coatings, additives and thinners in this emissions unit shall not exceed 20.0 pounds per day, including cleanup.

ApplicableCompliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)j.

d. Emission Limitation:

VOC emissions resulting from the use of all coatings, additives and thinners in this emissions unit shall not exceed 3.7 tons per year, including cleanup.

ApplicableCompliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)b.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.