



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/23/2011

Jon Deruytter
SOLON SPECIALTY WIRE CO
30000 SOLON RD
SOLON, OH 44139

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318531037
Permit Number: P0108707
Permit Type: Initial Installation
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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 PTI 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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
SOLON SPECIALTY WIRE CO**

Facility ID:	1318531037
Permit Number:	P0108707
Permit Type:	Initial Installation
Issued:	11/23/2011
Effective:	11/23/2011
Expiration:	11/23/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
SOLON SPECIALTY WIRE CO

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Authorization

Facility ID: 1318531037
Application Number(s): A0042711
Permit Number: P0108707
Permit Description: Initial PTIO for one Wastewater Evaporator (P011) fueled by a 3.5 MMBTU natural gas boiler used to evaporate VOC containing rolling mill coolants and wastewater, four Deco Respooling Lines that use non-halogenated solvents to clean wire (P012 - P015), and three aluminum drawing mills that clean wire of drawing oils/non-halogenated solvents (P016-P018).
Permit Type: Initial Installation
Permit Fee: \$1,400.00
Issue Date: 11/23/2011
Effective Date: 11/23/2011
Expiration Date: 11/23/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SOLON SPECIALTY WIRE CO
30000 SOLON ROAD
SOLON, OH 44139

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

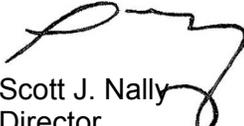
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108707

Permit Description: Initial PTIO for one Wastewater Evaporator (P011) fueled by a 3.5 MMBTU natural gas boiler used to evaporate VOC containing rolling mill coolants and wastewater, four Deco Respooling Lines that use non-halogenated solvents to clean wire (P012 - P015), and three aluminum drawing mills that clean wire of drawing oils/non-halogenated solvents (P016-P018).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P011
Company Equipment ID:	Wastewater Evaporator
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Aluminum Drawing Mills

Emissions Unit ID:	P016
Company Equipment ID:	Four Die Aluminum Drawing Mill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	E11T Aluminum Drawing Mill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	FX13 Aluminum Drawing Mill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Deco Respooling Lines

Emissions Unit ID:	P012
Company Equipment ID:	Deco Respooling Line.
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	Drawing Mills.
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	Deco Re-spooling Line.
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	P015
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. P011, Wastewater Evaporator

Operations, Property and/or Equipment Description:

Wastewater Evaporator fueled by a 3.5 MMBTU natural gas boiler used to evaporate VOC containing rolling mill coolants and wastewater from Rolling Mills U, G, and T.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)	Volatile Organic Compound (VOC) emissions shall not exceed 108 lbs per day and 16.8 tons per year (TPY).
b.	OAC rule 3745-21-07(M)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This rule does not apply because there are no VOC controls for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain yearly records of the following information for the wastewater evaporator:

- a. the total amount of coolant in gallons, processed through the emissions unit during the year;
- b. the annual VOC emissions from this emissions unit, calculated using the formula in f(1)a. below; and
- c. the total number of days the emissions unit was in operation.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland DAQ.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

a. Emissions Limitation:

VOC emissions shall not exceed 108 lbs/day and 16.8 TPY.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by the recordkeeping requirements specified in d)(1) and the following equation:

$$E(\text{lbs VOC/day}) = (M) \times (E.F.) \times (1 \text{ ton}/2,000 \text{ lbs})$$

Where,

M = annual amount of coolant used, in gallons.

E.F. = 0.75 lbs VOC/gallon (determined by Houghton Chemical test results dated December 2002).

Compliance with the daily limit shall be determined by dividing the actual annual emission rate (lbs/year) by the number of days the emissions unit was in operation each year.

g) Miscellaneous Requirements

(1) The permit emission limitations were calculated using the following equations:

where:

Coolant usage: 45,000-gallons/year

Operating time: 312 days/year

VOC content of coolant: 0.75 lb/gallon

$(45,000\text{-gallons/year}) / (312\text{ operating days/year}) = 144\text{ gallons/day}$

$(144\text{ gallons/day})(0.75\text{ lbs VOC/gallon}) = 108\text{ lbs/day}$

$(108\text{ lbs/day})(312\text{ days/year}) = 33,696\text{ lbs/year VOC}$

$(33,696\text{ lbs VOC/year})(1\text{ ton}/2,000\text{ lbs}) = 16.8\text{ TPY}$

2. Emissions Unit Group -Aluminum Drawing Mills: P016,P017,P018,

EU ID	Operations, Property and/or Equipment Description
P016	Aluminum drawing mill that uses a conveyORIZED degreaser with non-halogenated solvent to draw and clean wire.
P017	Aluminum drawing mill that uses a conveyORIZED degreaser with non-halogenated solvent to draw and clean wire.
P018	Aluminum drawing mill that uses a conveyORIZED degreaser with non-halogenated solvent to draw and clean wire.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/2001	Volatile Organic Compound (VOC) emissions shall not exceed 21.4 lbs per day and 3.3 tons per year (TPY) for each emissions unit. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 2/1/2006	See b)(2)b. and b)(2)c. below.
c.	OAC rule 3745-21-09(O)(4)	See b)(2)e., c(1), d(1), e(1), and f(1) below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 20, 2011, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.
- c. Permit to install and operate P0108707 for the above identified air contaminant sources takes into account the following voluntary restrictions (including use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Control (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. solvent use shall not exceed more than 1,000-gallons of non-halogenated solvent per year for each emissions unit.
- d. Only non-halogenated solvents shall be used in the above identified emission units.

c) Operational Restrictions

- (1) The conveyORIZED degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Workplace fans shall not be placed near the degreaser opening, and exhaust ventilation shall not exceed 65 cubic feet per minute per square foot of degreaser opening, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
 - b. Openings to the conveyORIZED degreaser shall be minimized during operation, so that entrances and exits silhouette workloads, with an average clearance between parts and the edge of the degreaser opening of less than 10 percent of the width of the opening.
 - c. Waste solvent shall be stored in covered containers.
 - d. Solvent leaks shall be repaired immediately, or the degreaser shall be shutdown.

- e. Porous and/or absorbent materials shall not be cleaned in the conveyORIZED degreaser.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information, collected at the end of each year:
 - a. the total cleaning solvent added to the conveyORIZED degreaser or the amount purchased for use in the emissions unit during the year;
 - b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year;
 - c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year; and
 - d. the total number of days the emissions unit was in operation.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland DAQ.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall include the following information in the annual PER:
 - a. any period of time during which any cover, for closing off the entrance and exit, was removed or left open when the conveyORIZED degreaser was not in use, excluding during maintenance activities;
 - b. any period of time during which the conveyORIZED degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit; and
 - c. any period of time during which any conveyORIZED degreaser having an air/solvent interface of more than 22 square feet was put into operation without controls required per OAC rule 3745-21-09(O)(4)(a).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 21.4 lbs/day and 3.3 TPY for each emissions unit.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by the recordkeeping requirements specified in d)(1). Compliance with the daily emission limit shall be determined by dividing the actual annual ton/year emission rate by the number of days the emissions unit operated each year.

(2) If necessary, U.S. EPA Method 24 shall be used to determine the VOC content of the solvent used in the above mentioned conveyORIZED vapor degreaser. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for the solvent, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that solvent to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precisions statements for Method 24.

g) Miscellaneous Requirements

(1) The permit emission limitations were calculated using the following equations:

where:

Solvent usage: 1,000-gallons/year

Operating time: 312 days/year

VOC content of solvent: 6.7 lbs/gallon

$(1,000\text{-gallons/year}) / (312\text{ operating days/year}) = 3.2\text{ gallons/day (per machine)}$

$(3.2\text{ gallons/day})(6.7\text{ lbs VOC/gallon}) = 21.4\text{ lbs/day (per machine)}$

$(21.4\text{ lbs/day})(312\text{ days/year}) = 6,677\text{ lbs/year VOC (per machine)}$

$(6,677\text{ lbs VOC/year})(1\text{ ton}/2,000\text{ lbs}) = 3.3\text{ TPY (per machine)}$

3. Emissions Unit Group -Deco Respooling Lines: P012,P013,P014,P015,

EU ID	Operations, Property and/or Equipment Description
P012	Deco re-spooling line that uses a conveyORIZED degreaser with non-halogenated solvent to clean wire and respool the wire for shipment.
P013	Deco re-spooling line that uses a conveyORIZED degreaser with non-halogenated solvent to clean wire and respool the wire for shipment.
P014	Deco re-spooling line that uses a conveyORIZED degreaser with non-halogenated solvent to clean wire and respool the wire for shipment.
P015	Deco re-spooling line that uses a conveyORIZED degreaser with non-halogenated solvent to clean wire and respool the wire for shipment.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/2001	Volatile Organic Compound (VOC) emissions shall not exceed 61.0 lbs per day and 9.5 tons per year(TPY) for each emissions unit. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b and b)(2)c. below.
c.	OAC rule 3745-21-09(O)(4)	See b)(2)e. through b)(2)g., c(1), d(1), e(1), and f(1) below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 20, 2011, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.
- c. Permit to install and operate P0108707 for the above identified air contaminant sources takes into account the following voluntary restrictions (including use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Control (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. solvent use shall not exceed more than 1,000-gallons of non-halogenated solvent per year for each emissions unit.
- d. Only non-halogenated solvents shall be used in the above identified emission units.

c) Operational Restrictions

- (1) The conveyORIZED degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Workplace fans shall not be placed near the degreaser opening, and exhaust ventilation shall not exceed 65 cubic feet per minute per square foot of degreaser opening, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
 - b. Openings to the conveyORIZED degreaser shall be minimized during operation, so that entrances and exits silhouette workloads, with an average clearance between parts and the edge of the degreaser opening of less than 10 percent of the width of the opening.
 - c. Waste solvent shall be stored in covered containers.
 - d. Solvent leaks shall be repaired immediately, or the degreaser shall be shutdown.

- e. Porous and/or absorbent materials shall not be cleaned in the conveyORIZED degreaser.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain records of the following information, collected at the end of each year:
 - a. the total cleaning solvent added to each conveyORIZED degreaser or the amount purchased for use in each of the emissions units during the year;
 - b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and
 - c. the estimated annual VOC emissions from each of the emissions units, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons per year; and
 - d. the total number of days the emissions unit was in operation.

e) **Reporting Requirements**

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland DAQ.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall include the following information in the annual PER:
 - a. any period of time during which any cover, for closing off the entrance and exit, was removed or left open when the conveyORIZED degreaser was not in use, excluding during maintenance activities;
 - b. any period of time during which the conveyORIZED degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit; and
 - c. any period of time during which any conveyORIZED degreaser having an air/solvent interface of more than 22 square feet was put into operation without controls required per OAC rule 3745-21-09(O)(4)(a).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 61.0 lbs/day and 9.5 TPY for each emissions unit.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by the recordkeeping requirements specified in d)(1). Compliance with the daily emission limit shall be determined by dividing the actual annual ton/year emission rate by the number of days the emissions unit operated each year.

- (2) If necessary, U.S. EPA Method 24 shall be used to determine the VOC content of the solvent used in the above mentioned conveyORIZED vapor degreaser. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for the solvent, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that solvent to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precisions statements for Method 24.

g) Miscellaneous Requirements

- (1) The permit emission limitations were calculated using the following equations,

where:

Solvent usage: 3,000-gallons/year
Operating time: 312 days/year
VOC content of solvent: 6.34 lbs/gallon

$(3,000\text{-gallons/year}) / (312\text{ operating days/year}) = 9.6\text{ gallons/day (per machine)}$
 $(9.6\text{ gallons/day})(6.34\text{ lbs VOC/gallon}) = 61.0\text{ lbs/day (per machine)}$
 $(61.0\text{ lbs/day})(312\text{ days/year}) = 19,032\text{ lbs/year VOC (per machine)}$
 $(19,032\text{ lbs VOC/year})(1\text{ ton}/2,000\text{ lbs}) = 9.5\text{ TPY (per machine)}$