



Environmental Protection Agency

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

12/1/2011

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0247040393
Permit Number: P0108872
Permit Type: OAC Chapter 3745-31 Modification
County: Lorain

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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice and the draft permit are enclosed. 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Ohio Screw Products is a metal parts machining facility located in Elyria, Ohio, in Lorain County. This is a permit modification for a trichloroethylene vapor degreaser.

3. Facility Emissions and Attainment Status:

Ohio Screw Products is a potential major source of HAP emissions (trichloroethylene). Lorain County is attainment for ozone.

4. Source Emissions:

This permit limits HAP emissions from the vapor degreaser to 8.0 tons per year by limiting trichloroethylene usage to 1311 gallons on a rolling, 12-month basis.

5. Conclusion:

By limiting HAP emissions from the vapor degreaser to 8.0 tons per year, this facility is not a major source of HAP emissions and, therefore, not subject to Title V permitting requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC/HAP	8.0

PUBLIC NOTICE
12/1/2011 Issuance of Draft Air Pollution Permit-To-Install and Operate

Ohio Screw Products, Inc.

818 Lowell Street,

Elyria, OH 44036

Lorain County

FACILITY DESC.: Precision Turned Product Manufacturing

PERMIT #: P0108872

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Modification of PTIO for vapor degreaser to allow increased short-term limit. No increase in annual emissions.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kristen Switzer, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Ohio Screw Products, Inc.**

Facility ID:	0247040393
Permit Number:	P0108872
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	12/1/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Ohio Screw Products, Inc.

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Authorization

Facility ID: 0247040393

Application Number(s): M0001395

Permit Number: P0108872

Permit Description: Modification of PTIO for vapor degreaser to allow increased short-term limit. No increase in annual emissions.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 12/1/2011

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

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

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:

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

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: P0108872

Permit Description: Modification of PTIO for vapor degreaser to allow increased short-term limit. No increase in annual emissions.

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

Emissions Unit ID:

L003

Company Equipment ID:

Vapor Degreaser

Superseded Permit Number:

P0105989

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 Ohio EPA DAPC, Northeast District Office 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.

¹ Permittees 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. L003, Vapor Degreaser

Operations, Property and/or Equipment Description:

Degreaser

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.	ORC 3704.03(T)	The requirements of this rule are equivalent the requirements of 40 CFR Part 63, Subpart T.
b.	OAC rule 3745-21-09(O)	In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(3) shall not apply to this emissions unit.
c.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) / hazardous air pollutant (HAP) emissions shall not exceed 8.0 tons per year. See b)(2)b and b)(2)c.
d.	40 CFR Part 63, Subpart T	See b)(2)a, c)(1), c)(2), c)(3) and c)(4).
e.	40 CFR Part 63, Subpart A	Appendix B to Subpart T of Part 63 - General Provisions of Applicability to Subpart T lists which parts of the General Provisions in 40 CFR 63.1-15 apply.

- (2) Additional Terms and Conditions
- a. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
- i. Use an idling and downtime mode cover and ensure that the cover opens only for part entrance and removal, that it may be readily opened or closed, that it completely covers the solvent cleaning machine openings when in place, and that it is free of cracks, holes, and other defects; or, use a reduced room draft that ensures that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in Section d) of this permit. [The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in Section d) of this permit.]
 - ii. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.
 - iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or a parts basket at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - iv. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - v. The solvent 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.
 - vi. The solvent cleaning machine shall have a primary condenser.
- b. Compliance with the annual emission limitation for VOC/HAP shall be based upon a rolling, 12-month summation of the monthly solvent usage.
- c. The annual limit of VOC is sufficient to effectively limit HAPs to below Title V thresholds.
- c) Operational Restrictions
- (1) Solvent (trichloroethylene) usage shall not exceed 1311 gallons based upon a rolling, 12-month summation.
 - (2) The permittee shall meet all of the following required work and operational practices:
 - a. Air disturbances across the solvent cleaning machine opening(s) shall be controlled by ensuring that the cover(s) to the solvent cleaning machine shall be

in place during the idling mode and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place;

- b. The parts basket or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less;
- c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine);
- d. Parts shall be orientated so that the solvent drains from them freely (parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA Northeast District Office);
- e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped;
- f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater;
- g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
- h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
- i. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA Northeast District Office to achieve the same or better results as those recommended by the manufacturer;
- j. The permittee shall complete and pass the applicable Sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B, if requested during an inspection by the Ohio EPA Northeast District Office;
- k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container; and
- l. Sponges, fabric, wood, and paper products shall not be cleaned in this emissions unit.

- (3) The permittee shall comply with the following requirements:
 - a. Ensure that the flow or movement of air within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures outlined in Section d) of these terms and conditions.
 - b. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less.
 - c. Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees Fahrenheit above the solvent's boiling point.
 - d. Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system are followed.
 - e. Ensure that parts remain within the superheated vapor for at least the minimum proper dwell time.
 - (4) The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall monitor the hoist speed as described below:
 - 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 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.
 - c. 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.

If the permittee can demonstrate to the satisfaction of the Ohio EPA Northeast District Office in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
 - (2) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
 - a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
 - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that

- the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted;
- c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine; and
 - d. Records of the tests required as specified in d)(1).
- (3) 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 control device monitoring required in this Section of the permit;
 - b. Information on the actions taken to comply with the Operational Restrictions of this permit, including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels; and
 - c. Estimates of annual trichloroethylene consumption for the solvent cleaning machine.
- (4) The permittee shall conduct monitoring and record the results on a weekly basis for the superheated vapor system by using a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in idling mode.
- (5) If an enclosure (full or partial) is used to achieve a reduced room draft, the owner or operator shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedures below and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes, and other defects:
- a. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until maximum speed is located.
 - b. Record the maximum wind speed.
- (6) If the permittee employs a working mode cover, the permittee shall conduct monitoring and record the results on a monthly basis for the working mode cover by conducting a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (7) The permittee shall record for each month the following:
- a. The amount of solvent added to the solvent cleaning machine, in gallons (if no solvent was added, the record should state such); and
 - b. The 12-month rolling summation of annual solvent usage, in gallons.

The permittee may take credit for recovered solvent from waste solvent sent offsite by subtracting the amount of recovered solvent, in gallons, from the amount of solvent added for that month.

e) Reporting Requirements

- (1) The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
 - a. A signed statement from the facility owner or the owner's designee stating that "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR Part 63.643(d)(10)"; and
 - b. The total solvent usage during the reporting period.
- (2) The permittee shall submit an exceedance report on a semiannual basis. If the manufacturer's specification for determining the minimum dwell time within the superheated vapor system was not followed and/or parts did not remain within the vapor zone for at least the minimum proper dwell time and/or if the temperature of the solvent vapor at the center of the superheated vapor zone was less than 10 degrees Fahrenheit above the solvent's boiling point, and correction was not made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. Each exceedance report shall be delivered or postmarked by the 30th day following the reporting period. Each exceedance report shall contain the following:
 - a. The reason and a description of the exceedance and 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
 - b. If no exceedance has occurred, a statement to that effect shall be submitted.
- (3) The permittee shall submit a wind speed exceedance report on a semiannual basis. If no operational conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 day of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. Each exceedance report shall be delivered or postmarked by the 30th day following the reporting period. Each exceedance report shall contain the following:
 - a. The reason and a description of the exceedance and 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

- b. If no exceedance has occurred, a statement to that effect shall be submitted.
 - (4) The permittee shall submit deviation (excursion) reports that include the following information for emissions unit L003:
 - a. All exceedances of the rolling, 12-month summation of solvent usage in c(1).
 - (5) Annual Permit Evaluation (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 of the Ohio EPA 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 12-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC/HAP emissions shall not exceed 8.0 tons per year.

Applicable Compliance Method:
Compliance shall be assumed provided that compliance with the rolling, 12-month limit for solvent usage of 1311 gallons is demonstrated.
- g) Miscellaneous Requirements
- (1) The permittee has submitted an initial notification report in accordance with 40 CFR 63.468(b).
 - (2) The permittee has submitted an initial statement of compliance in accordance with 40 CFR 63.468(d).
 - (3) All VOC emitted from this source (emissions unit L003) are HAP emissions as defined in Section 112(b) of the Clean Air Act.