

Facility ID: 0285010331 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0285010331 Emissions Unit ID: P005 Issuance type: Final State Permit To Operate

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## Part II - Special Terms and Conditions

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.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
cold solvent wire cleaning operation consisting of 5 stationary and 9 portable units	OAC rule 3745-31-05(A)(3) (PTI 02-22566 Effective 10/9/2007)	4872.1 lbs. per month and 29.23 tons per year of VOC emissions Also see B.1 below.

### 2. Additional Terms and Conditions

- (a) None

### B. Operational Restrictions

1. The cold solvent cleaning units 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 cold solvent cleaning units opening, and exhaust ventilation shall not exceed 65 cubic feet per minute per square foot of cold solvent cleaning units opening, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.
  - b. Openings to the cold solvent cleaning units shall be minimized during operation, so that entrances and exits silhouette workloads.
  - c. The cold solvent cleaning units shall be provided with downtime covers for closing off the entrance and exit during shutdown hours when solvent remains in the unit.
  - d. The top access lids of the cold solvent cleaning units shall remain closed to prevent solvent evaporation, except when line speed produce a danger of vapor flashing.
  - e. Waste solvent and solvent saturated rags shall be stored in covered containers.
  - f. Solvent leaks shall be repaired immediately, or the cleaner shall be shut down.

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

1. The permittee shall inspect the cold cleaning units daily and maintain records of the following information:
  - a. the date and amount of time that any workplace fans was placed near the cold solvent cleaning units opening, and exhaust ventilation that exceeds 65 cubic feet per minute per square foot of cold solvent cleaning units opening, except if a higher rate is necessary to meet Occupational Safety and Health Administration requirements;
  - b. the date and amount of time any cover, for closing off the entrance and exit, was removed or left open when the cold solvent cleaning units was not in use, excluding during maintenance activities;
  - c. the date and amount of time that any top access lid of the cold solvent cleaning units was not closed to prevent solvent evaporation, except when line speed produces a danger of vapor flashing;
  - d. the date that any waste solvent and solvent saturated rags were not stored in covered containers; and
  - e. the date of any solvent leak and the maintenance records documenting the corrective action and time frame to correct the leak.

These records shall include the corrective action taken to return the units into compliance. These records shall be maintained for at least 5 years and shall be made available to the director or his representative upon verbal or written request.

2. The permittee shall collect and record the following information for each month for the solvent cleaning operation:
  - a. the company identification for cleaning solvent employed;
  - b. the number of gallons of each cleaning solvent dispensed;
  - c. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the month;
  - d. the VOC content of each cleaning solvent, in pounds per gallon; and
  - e. the total organic compound emission rate for all cleaning solvent, in pounds per month.
3. The permittee shall maintain records of the following information, collected at the end of each year:
  - a. the total cleaning solvent added to the cold solvent cleaning units 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; and
  - 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.
4. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent CAS # 8052-41-3  
TLV (mg/m3): 525 mg/m3  
Maximum Hourly Emission Rate (lbs/hr): 6.67  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2900  
MAGLC (ug/m3): 12,500

5. Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).  
If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.
6. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or

the materials applied.

**D. Reporting Requirements**

1. The permittee shall submit annual reports that identify:
  - a. the date and amount of time that any workplace fans was placed near the cold solvent cleaning units opening, and exhaust ventilation that exceeds 65 cubic feet per minute per square foot of cold solvent cleaning units opening, except if a higher rate is necessary to meet Occupational Safety and Health Administration requirements;
  - b. the date and amount of time any cover, for closing off the entrance and exit, was removed or left open when the cold solvent cleaning units was not in use, excluding during maintenance activities;
  - c. the date and amount of time that any top access lid of the cold solvent cleaning units was not closed to prevent solvent evaporation, except when line speed produces a danger of vapor flashing;
  - d. the date that any waste solvent and solvent saturated rags were not stored in covered containers; and
  - e. the date of any solvent leak and the maintenance records documenting the corrective action and time frame to correct the leak.

These records shall include the corrective action taken to return the units into compliance.

2. The permittee shall submit annual reports that:
  - a. identify any month during which the VOC emissions exceeded the allowable monthly VOC emission;
  - b. specify the total organic compound emissions from this emissions unit for the previous calendar year; and
  - c. document any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.

This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in sections A.1 and A.2 of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emission Limitation:  
VOC emissions shall not exceed 4872.1 lbs. per month and 29.23 tons per year.

Applicable Compliance Method:  
Compliance with the monthly and annual emission limitations shall be demonstrated by the records kept in Sections C.3 and C.4.

**F. Miscellaneous Requirements**

1. None