



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

11/30/2012

Dale Diemer  
Metal Seal Precision Ltd.  
7333 Corporate Blvd  
Mentor, OH 44060

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0243082009  
Permit Number: P0110285  
Permit Type: Initial Installation  
County: Lake

Certified Mail

|     |                                    |
|-----|------------------------------------|
| No  | TOXIC REVIEW                       |
| No  | PSD                                |
| No  | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No  | CEMS                               |
| Yes | MACT/GACT                          |
| No  | NSPS                               |
| No  | NESHAPS                            |
| No  | NETTING                            |
| No  | MAJOR NON-ATTAINMENT               |
| No  | MODELING SUBMITTED                 |
| No  | MAJOR GHG                          |
| No  | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

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. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/pemitsurvey.aspx](http://www.epa.ohio.gov/dapc/pemitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NEDO; Pennsylvania; Canada



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Metal Seal Precision Ltd.**

|                |                      |
|----------------|----------------------|
| Facility ID:   | 0243082009           |
| Permit Number: | P0110285             |
| Permit Type:   | Initial Installation |
| Issued:        | 11/30/2012           |
| Effective:     | 11/30/2012           |





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Metal Seal Precision Ltd.

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**Final Permit-to-Install**  
Metal Seal Precision Ltd.  
**Permit Number:** P0110285  
**Facility ID:** 0243082009  
**Effective Date:** 11/30/2012

## Authorization

Facility ID: 0243082009  
Facility Description:  
Application Number(s): A0044751  
Permit Number: P0110285  
Permit Description: Installation of methylene chloride and N-propyl bromide open-top vapor degreasers  
Permit Type: Initial Installation  
Permit Fee: \$200.00  
Issue Date: 11/30/2012  
Effective Date: 11/30/2012

This document constitutes issuance to:

Metal Seal Precision Ltd.  
7333 Corporate Blvd  
Mentor, OH 44060

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

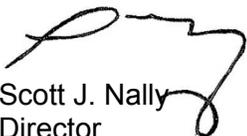
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".  
Scott J. Nally  
Director



**Final Permit-to-Install**  
Metal Seal Precision Ltd.  
**Permit Number:** P0110285  
**Facility ID:** 0243082009  
**Effective Date:** 11/30/2012

## Authorization (continued)

Permit Number: P0110285

Permit Description: Installation of methylene chloride and N-propyl bromide open-top vapor degreasers

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

|                                   |                                    |
|-----------------------------------|------------------------------------|
| <b>Emissions Unit ID:</b>         | <b>L001</b>                        |
| Company Equipment ID:             | Methylene Chloride Vapor Degreaser |
| Superseded Permit Number:         |                                    |
| General Permit Category and Type: | Not Applicable                     |



**Final Permit-to-Install**  
Metal Seal Precision Ltd.  
**Permit Number:** P0110285  
**Facility ID:** 0243082009  
**Effective Date:** 11/30/2012

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying 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.

#### **4. 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, 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.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) 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 ORC section 3704.08.
  - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. 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.



**Final Permit-to-Install**  
Metal Seal Precision Ltd.  
**Permit Number:** P0110285  
**Facility ID:** 0243082009  
**Effective Date:** 11/30/2012

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
Metal Seal Precision Ltd.  
**Permit Number:** P0110285  
**Facility ID:** 0243082009  
**Effective Date:** 11/30/2012

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.
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 Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart T. The permittee shall also comply with all applicable General Provisions as identified in Appendix B. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart T.



**Final Permit-to-Install**  
Metal Seal Precision Ltd.  
**Permit Number:** P0110285  
**Facility ID:** 0243082009  
**Effective Date:** 11/30/2012

## **C. Emissions Unit Terms and Conditions**



**1. L001, Methylene Chloride Vapor Degreaser**

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

Methylene chloride open-top vapor 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 established pursuant to this rule are equivalent to the requirements specified in 40 CFR Part 63, Subpart T.                             |
| b. | 40 CFR Part 63, Subpart T     | See b)(2)a through b)(2)c.  |
| c. | OAC rule 3745-21-09(O)        | This emissions unit is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5) pursuant to OAC rule 3745-21-09(O)(6).<br><br>See b)(2)d. |

(2) Additional Terms and Conditions

a. The batch vapor cleaning machine, having a solvent/air interface area greater than 1.21 square meters (13 square feet), shall employ a freeboard ratio of 1.0, reduced room draft, and superheated vapor, as the chosen control combination selected from Table 2 of 40 CFR Part 63, Subpart T.



- b. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
    - i. The permittee shall use a reduced room draft (in this case, a full enclosure of the solvent cleaning machine, by design) 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.
    - ii. 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.
    - iii. The vapor cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
    - iv. The vapor cleaning machine shall have a primary condenser.
  - c. 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), from the initial loading of parts through removal of cleaned parts.
  - d. In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(2) through (O)(5) shall not apply to this emissions unit subject to the federal MACT standards provided the requirements of 40 CFR Part 63, Subpart T are specified in the permit terms and conditions.
- c) Operational Restrictions
- (1) The permittee shall conduct periodic monitoring of the parameters used to demonstrate compliance, as described in the Monitoring and Recordkeeping Requirements section of this permit; and these parameters shall meet the requirements established in this permit.
  - (2) The permittee shall 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 the Monitoring and Recordkeeping Requirements section of this permit; and 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.
  - (3) The permittee shall comply with the following requirements:
    - a. ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10°F above the solvent's boiling point;
    - b. ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed; and



- c. 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.
- (5) 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 manufacturer(s) of the equipment; or maintained 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(s).
  - 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).
  - h. 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).
  - i. 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.
  - j. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
- d) **Monitoring and/or Recordkeeping Requirements**
  - (1) The permittee shall conduct an initial monitoring test, and establish annual monitoring thereafter, of the wind speed within the total enclosure, using the following procedures:



- a. the direction of the wind current in the enclosure shall be determined by slowly rotating a velometer or similar device inside the entrance to the enclosure until the maximum speed is located; and
- b. the maximum wind speed shall be recorded.

In accordance with 40 CFR 63.466(g), each owner or operator using a control device listed in paragraphs (a) through (e) of 40 CFR 63.466 can use alternative monitoring procedures approved by the Director. In this case, the permittee has requested that wind speed be monitored less frequently than specified in 40 CFR 63.466(d) since the solvent cleaning machine is totally enclosed, by design.

The permittee shall also perform monthly visual inspections of the enclosure to determine if it is free of leaks, cracks, holes, and other defects. A record of each inspection and the wind current shall be maintained on file or in an operational log.

- (2) Using a thermometer or thermocouple, the permittee shall measure and record, on a monthly basis, the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.

In accordance with 40 CFR 63.466(g), each owner or operator using a control device listed in paragraphs (a) through (e) of 40 CFR 63.466 can use alternative monitoring procedures approved by the Director. In this case, the permittee has requested that temperature at the center of the superheated solvent vapor zone be monitored less frequently than specified in 40 CFR 63.466(a) since the temperature does not vary and the solvent cleaning machine is totally enclosed.

- (3) Because the freeboard area of this degreaser is enclosed with welded stainless steel, and according to the manufacturer the degreaser is designed and built with a freeboard ratio of 1.3, and adding or removing solvent does not change the vapor level which in turn does not change the freeboard ratio, the permittee will not be required to measure and record the freeboard ratio before and after each addition of make-up solvent to assure compliance with the control requirement limitation.

The permittee shall record any occurrence, adjustment, maintenance, or any other factor which may or actually reduces the freeboard ratio to below compliant levels.

- (4) 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 meter per minute (3 feet per minute). This determination shall be recalculated if the parts or basket size increase.



- c. The permittee has demonstrated 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 hoist speed is established mechanically and cannot be altered by the permittee or its operators. Therefore, the required monitoring frequency may be annual.

In accordance with 40 CFR 63.466(g), each owner or operator using a control device listed in paragraphs (a) through (e) of 40 CFR 63.466 can use alternative monitoring procedures approved by the Director. In this case, the permittee has requested that hoist speed be monitored less frequently than specified in 40 CFR 63.466(c) since the hoist speed is established mechanically and will not vary.

- (5) 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 (methylene chloride) solvent content for each solvent used in the solvent cleaning machine; and
  - c. the date of installation for the solvent cleaning machine and all of its control devices.

e) Reporting Requirements

- (1) The permittee shall submit an initial statement of compliance to the regulating agency no later than 150 days following startup of the unit. This report shall include the following information:
  - a. the name and address of the permittee;
  - b. the address (i.e., physical location) of the solvent cleaning machine;
  - c. a list of the control equipment (options) used to achieve compliance;
  - d. for each piece of control equipment required to be monitored, a list of the parameters monitored, and the values of these parameters measured on or during the first month after the compliance date; and
  - e. operating conditions used to maintain the wind speed to ensure that the flow of air across the top of the freeboard area or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute).
- (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.
- (3) The permittee shall submit an annual deviation report if annual 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 feet per minute).
- (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 record keeping 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.
- (5) The permittee shall submit a deviation report if no operating 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 was not corrected within 15 days of detection.
- (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.
- (7) The permittee shall submit a deviation report if the freeboard ratio is not maintained at 1.0 or greater.
- (8) 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.

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/Control Requirements:

The permittee has selected or has installed and shall employ a freeboard ratio of 1.0, reduced room draft, and superheated vapor, as the control combination required from Table 2, found in 40 CFR 63.463.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the selected control combination, a freeboard ratio of 1.0, reduced room draft, and superheated vapor, through compliance with the Additional Terms and Conditions, Operational Restrictions, Monitoring and Recordkeeping Requirements, and Testing Requirements sections of this permit.

- b. Emission Limitation/Control Requirements:

The flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure shall not exceed 15.2 meters/minute (50 feet/minute).

Applicable Compliance Method:

The permittee shall conduct annual monitoring tests of the windspeed within the enclosure and monthly visual inspections to assure the enclosure is free from cracks, holes, or other defects, following the initial monitoring test. The maximum wind speed shall be determined by rotating a velometer or similar device inside the entrance of the enclosure.

- c. Emission Limitation/Control Requirements:

The freeboard ratio shall not exceed 1.0.



Applicable Compliance Method:

Because the freeboard area of this degreaser is enclosed with welded stainless steel, and according to the manufacturer the degreaser is designed and built with a freeboard ratio of 1.3, and adding or removing solvent does not change the vapor level which in turn does not change the freeboard ratio, the permittee will not be required to measure and record the freeboard ratio before and after each addition of make-up solvent to assure compliance with the control requirement limitation.

d. Emission Limitation/Control Requirements:

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

Applicable Compliance Method:

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

e. Emission Limitation/Control Requirements:

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 Recordkeeping Requirements section of this permit. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

g) Miscellaneous Requirements

- (1) None.