OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/28/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

L001 (Open Top Vapor Degreaser) Open Top Vapor Degreaser used for degreasing;

R. W. Screw Products (15-76-13-1761)
Jeff Grace
PO Box 310
Massillon, OH 44648

Dear Jeff Grace:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Canton Division of Air Pollution Control at (330) 489-3385.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Canton Division of Air Pollution Control

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 05/28/03

Expiration Date: 05/28/08

This document constitutes issuance to:

Facility ID: 15-76-13-1761
R. W. Screw Products
999 Oberlin Road, S.W.
Massillon, OH 44647

of a permit to operate for:

L001 (Open Top Vapor Degreaser)
Open Top Vapor Degreaser used for degreasing;

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

4. Records Retention Requirements

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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit.

Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
L001 - Open top vapor degreaser utilizing trichloroethylene (CAS No. 79 - 01 - 6); Baron Blakeslee Model HL-384 with freeboard ratio of 1.11 and freeboard refrigeration device	NESHAP- 40 CFR PART 63 Subpart T	See section A.2.a.
	OAC rule 3745-31-05(A)(3) PTI 15-01403 Draft/Final	The trichloroethylene (TCE) emissions shall not exceed 0.67 ton/month and 8 tons/year. The requirements of this rule also include compliance with the requirements of NESHAP 40 CFR Part 63, Subpart T and OAC rule 3745-21-09(O).
	OAC rule 3745-21-09(O)	See section A.2.b.
	OAC rule 3745-31-05(D) Synthetic Minor Restriction	See section A.2.c.

2. **Additional Terms and Conditions**

2.a The permittee shall comply with the following requirements:

i. the permittee shall ensure that the chilled air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point;

ii. the permittee shall maintain a free board with a freeboard ratio equal to or greater than 1.0;

iii. the permittee shall employ a cover that may be readily opened or closed, shall cover the cleaning degreaser openings completely when in place, and is free of cracks, holes and other defects;

iv. this emissions unit shall be equipped with the following; and

aa. an automated parts handling system capable of moving parts or parts baskets 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;

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

ac. a primary condenser and a vapor level control device that shuts off sump heat if the vapor level rises above the height of the primary condenser;

v. this emissions unit shall not employ a lip exhaust system.

2.b Since this degreaser is subject to 40 CFR Part 63, Subpart T, it is exempted from OAC rule 3745-21-09, paragraphs (O)(2) through (O)(5).

2. Additional Terms and Conditions (continued)

2.c The usage of Hazardous Air Pollutants(HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 0.67 ton/month for any individual HAP. The term usage assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used will evaporate.

B. Operational Restrictions

1. The permittee shall meet all of the following required work and operational practices:

a. the cover 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 does not require it to be in place;

b. the parts baskets 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 meter 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.

d. 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 Director (appropriate field office or local air agency);

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 degreaser 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 Director (appropriate field office or local air agency);

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 Director (appropriate field office or local air agency);

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 must not allow liquid solvent to drain from the container; and

l. sponges, fabric, wood, and paper products shall not be cleaned.

C. Monitoring and/or Record Keeping Requirements

1. 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; and

   c. monthly records of the halogenated HAP solvent content and quantity in the degreaser tank.

2. The permittee shall maintain monthly records of the following information. These records shall be kept for a period of not less than 5 years:

   a. the identification of the degreasing solvent employed;

   b. the number of gallons of degreasing solvent used;

   c. the number of gallons of degreasing solvent waste;

   d. the temperature of the solvent within the distilling apparatus at the beginning and the end of each calendar month and before and after the removal of solvent from the distilling apparatus as waste; and

   e. the average monthly TCE content, in percent by volume, of the solvent waste. The TCE percent by volume shall be determined by using a boiling point vs. concentration table provided by the manufacturer of the solvent. The average percent by volume of TCE in the solvent waste shall be determined based on the final boiling temperature of the solvent wasted from the distilling apparatus just prior to cleaning of the distilling apparatus; and

   f. the monthly HAPs emission rate, in tons per month. See section E.1.a for the calculation method.

3. The permittee shall conduct a monthly visual inspection of the cover to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed and if free of cracks holes, and other defects. The permittee shall maintain records of the findings of the inspections which specify the date and time of the inspection, whether the cover is opening and closing properly, whether the cover completely covers the openings of the cleaning machine and if the cover is free of any cracks, holes, and other defects. If the results of the inspection indicate that the cover is not free of cracks, holes and other defects, then the permittee shall make any necessary repairs within 15 days of detection and maintain a record of when the repairs were completed.

4. The permittee shall conduct monthly monitoring of the speed of the hoist used to lower and raise parts from the degreaser. The hoist speed shall be determined by measuring the time it takes the hoist to travel a measured distance. The speed is equal to the distance in meters or feet divided by the time in minutes.

5. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode. If the results of the monitoring indicate a temperature exceeding the allowable limit specified in section A.2.a, the permittee shall make any necessary adjustments or repairs in order to reestablish the required temperature within 15 days of detection. The temperature shall be remeasured immediately upon completion of the adjustment or repair to demonstrate that the emissions unit is in compliance. The permittee shall maintain a record of the day when the adjustment was completed and the unit was in compliance.

C. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent degreaser:

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

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

D. 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 their 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 pursuant to 40 CFR 63.463 (d)(10)"; and

   b. an estimate of solvent consumption during the reporting period.

2. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Canton LAA, which includes the following information for this emissions unit:

   a. if the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection;

   b. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR Parts 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;

   c. an identification of each month during which the emissions of an individual HAP from the facility exceeded 1,340 lbs;

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

   e. if the idling-mode cover is not in place when parts are not in the degreaser or the cover does not completely cover the degreaser; and

   f. if the cover is not free of holes, cracks, or other defects and no correction was made within 15 days of detection.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accordance with the following method(s).

E. Testing Requirements (continued)

1.a Emissions Limitation:
The trichloroethylene (TCE) emissions shall not exceed 0.67 ton/month and 8 tons TCE/year.

Applicable Compliance Method:
Compliance shall be demonstrated if the calculated actual HAP emission rate is less than or equal to 0.67 ton of TCE per month. To determine the actual HAP emission rate, the following equation shall be used:

$E = (Ls - (Lw \times f)) \times (D/2000)$

E = HAP emission rate (ton/month)

Ls = liquid volume of TCE solvent employed each month (gallons)

Lw = liquid volume of TCE solvent waste (gallons)

f = average volume fraction of TCE in solvent waste (dimensionless)

D = density of TCE degreasing solvent (pounds/gallon)

The permittee shall provide to the Canton LAA the methodology to be used for determining TCE emissions for approval.

1.b Emissions Limitation:
8 tons/year compounds

Applicable Compliance Method:
Compliance shall be demonstrated by the summing of the 12 monthly HAP emission rates for the calendar year.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D and E of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D).

2. In accordance with 40 CFR Part 63.469, upon written application, the Administrator may approve the use of equipment or procedures after they have been satisfactorily demonstrated to be equivalent, in terms of reducing emissions of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform to the atmosphere, to those prescribed for compliance within a specified paragraph of 40 CFR Part 63 Subpart T. The application must contain a complete description of the equipment or procedure and the proposed equivalency testing procedure and the date, time, and location scheduled for the equivalency demonstration.