



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
CLARK COUNTY**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

Application No: 08-04490

DATE: 5/20/2003

Trutec Industries Inc
Peggy White
4700 Gateway Blvd
Springfield, OH 45502-8817

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN

CLARK COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-04490

On 5/20/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of an administrative modification of a prior Permit To Install document for an air contaminant source for **Trutec Industries Inc**, located at **4700 Gateway Blvd, Springfield, Ohio**.

The administrative modification shall become effective upon final issuance.

mod. of L001-L003 to increase individual allowables to equal their combined limits; L001- L002, chap 31 replacing 08-02356 issued 2-20-92; L003, chap 31 replacing 08-03533 issued 9-25-96.

Comments concerning this draft action, or a request for a public hearing, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04490

Application Number: 08-04490
APS Premise Number: 0812100458
Permit Fee: **To be entered upon final issuance**
Name of Facility: Trutec Industries Inc
Person to Contact: Peggy White
Address: 4700 Gateway Blvd
Springfield, OH 45502-8817

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4700 Gateway Blvd
Springfield, Ohio**

Description of proposed emissions unit(s):
mod. of L001-L003 to increase individual allowables to equal their combined limits; L001- L002, chap 31 replacing 08-02356 issued 2-20-92; L003, chap 31 replacing 08-03533 issued 9-25-96.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Trutec Industries Inc

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PTI Application: 08-04490

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. 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 this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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

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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).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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 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 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 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.)

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

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5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

6. 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.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally

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Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	96.78

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Trutek
PTI A

Emissions Unit ID: L001

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
L001 - TCE Vapor Degreaser No.1 (carburizing area), with idling emission limit, 1.0 freeboard ratio, and reduced room draft	40 CFR, Part 63, Subpart T OAC rule 3745-31-05(A)(3) PTI 08-2356	See Sections A.I.2 and A.II. The individual maximum volatile organic compounds (VOC) emission rates for emissions unit L001 shall not exceed 8.07 tons per month and 96.78 tons per year; with the combined emission rates for emissions units L001, L002 and L003 not to exceed 8.07 tons per month and 96.78 tons per year VOC. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart T.

*modification

2. Additional Terms and Conditions

- 2.a The permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilogram per hour per square meter (0.045 pound per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465 (a) and 40 CFR 63, Appendix A.
- 2.b The permittee shall perform the following activities:
 - a. Conduct an initial performance test to demonstrate compliance with the applicable idling emission limit and to establish parameters that will be monitored to

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demonstrate compliance. The initial performance test that demonstrated compliance was completed on March 24, 2000.

- b. Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - c. Operate the solvent cleaning machine within the parameters identified in the initial performance test.
- 2.c** The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.
- 2.d** The permittee shall ensure that the air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, is no greater than 100 degrees Fahrenheit.
- 2.e** The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
- a. The solvent cleaning machine shall be designed or operated to meet the following control equipment or technique requirements: Use of 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 the "Monitoring and/or Recordkeeping Requirements" section 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 the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - b. The solvent cleaning machine shall have 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.
 - c. The solvent 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.
 - e. 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.

- f. The solvent cleaning machine shall have a primary condenser.

II. Operational Restrictions

1. The permittee shall meet all of the following required work and operational practices:
 - a. Control air disturbances across the solvent cleaning machine opening(s) by incorporating the following control equipment or techniques: The permittee shall employ a reduced room draft that ensures that 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 does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall also 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 the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - b. The parts baskets or the parts being cleaned in 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 (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - 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 District 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.

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- 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 Director (appropriate District Office or local air agency) 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 Director (appropriate District 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.
- l. Sponges, fabric, wood, and paper products shall not be cleaned.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the initial performance test, completed on March 24, 2000, including the idling emission rate and values of the monitoring parameters measured during the test. These records shall be maintained for the lifetime of the solvent cleaning machine.
2. The permittee shall conduct an initial monitoring test of the wind speed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:
 - a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - i. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
 - ii. Orient a velometer in the direction of the wind current at each of the four corners of the machine.
 - iii. Record the reading for each corner.
 - iv. Average the values obtained at each corner and record the average wind speed.
 - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
3. The permittee shall conduct monitoring and record the results on a weekly basis for the air blanket temperature by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

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4. 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.
 - d. If the permittee can demonstrate to the satisfaction of the Director (appropriate District Office or local air agency) 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.
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. 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.
6. 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 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made,

Emissions Unit ID: L001

and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

- c. Estimates of annual consumption of trichloroethylene for the solvent cleaning machine.
7. The permittee shall record the following information each month for the vapor degreaser:
- a. The amount of trichloroethylene solvent added to the tank, in gallons.
 - b. The total amount of waste solvents removed for disposal, in gallons.
 - c. The trichloroethylene content of the waste removed, in percent by volume.
 - d. The amount of trichloroethylene solvent sent off site for disposal (b x c), in gallons.
 - e. The total VOC emissions, in tons, calculated as follows:

$$E = ((L_s - L_w) \times D) / 2000$$

where:

E = volatile organic compound emission rate (tons/month)

L_s = liquid volume of trichloroethylene solvent employed each month (gallons)

L_w = liquid volume of trichloroethylene solvent sent off site as waste (gallons), determined from tests conducted using EPA reference method 25d, an equivalent method approved by the Director or by engineering calculations included in the compliance report.

D = density of trichloroethylene solvent (pounds/gallon)

IV. Reporting Requirements

- 1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5 (d) (1) of subpart A, with the following revisions and additions:
 - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
 - b. The report shall include the anticipated compliance approach for the solvent cleaning

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machine.

- c. The report shall include an estimate of the trichloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5 (d) (1) (ii) (H), subpart A.

*The initial notification report for this emissions unit was submitted on September 8, 1995 and a revised report was received on February 1, 2001.

2. The permittee shall submit an initial statement of compliance no later than 150 days after December 2, 1997. Each initial statement of compliance shall contain the following:

- 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 used to achieve compliance.
- d. A list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date for each piece of control equipment required to be monitored.
- e. Conditions to maintain the wind speed requirements as described in the "Additional Terms and Conditions" section of this permit.

*The initial statement of compliance for this emissions unit was submitted on April 27, 1999 and a revised statement was received on February 1, 2001.

3. The permittee shall submit a test report for tests of idling emissions meeting the specifications in Method 307 of 40 CFR Part 63, Appendix A. This report shall comply with the following requirements:

- a. The test must be conducted on the same specific model solvent cleaning machine used at the facility. The test can be done by the permittee of the affected machine or can be supplied by the vendor of that solvent cleaning machine or a third party. If a solvent cleaning machine vendor or a third party test report is used to demonstrate compliance, the following requirements shall be met:
 - i. The report shall include the following for the solvent cleaning machine tested: name of person(s) or company that performed the test, model name, the date the solvent cleaning machine was tested, serial number, and a diagram of the solvent cleaning machine tested.

- ii. The permittee shall comply with the following requirements:
 - (a) Submit a statement by the solvent cleaning machine vendor that the unit tested is the same as the unit the report is being submitted for.
 - (b) Demonstrate to the satisfaction of the Director (appropriate District Office or local air agency) that the trichloroethylene emissions from the solvent cleaning machine for which the test report is being submitted are equal to or less than the trichloroethylene emissions from the solvent cleaning machine in the vendor test report.

- b. The report must clearly state the monitoring parameters, monitoring frequency and the delineation of exceedances for each parameter.

*The idling emissions test report for this emissions unit was received on April 14, 2000.

4. The permittee shall submit an exceedance report on a semiannual basis. If any of the following exceedances occur, the permittee shall begin to submit these exceedance reports on a quarterly basis until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (appropriate District Office or local air agency):

- a. If no operating conditions or room parameters were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
- b. 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 days of detection.
- c. If the temperature of the air blanket, measured at the center of the air blanket, was greater than 100 degrees Fahrenheit during idling mode, and no correction was made within 15 days of detection.
- d. If the hoist speed exceeded 3.4 meters per minute (11 feet per minute) and no correction was made within 15 days of detection.

5. Each exceedance report shall be delivered or post marked 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

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description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

- b. If no exceedance has occurred, a statement to that effect shall be submitted.
6. The permittee may receive approval of less frequent reporting if all 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 recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions.
 - c. The Director (appropriate District Office or local air 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.
 7. The permittee shall submit semiannual deviation (excursion) reports that identify any exceedances of the monthly VOC emission limitation of 8.07 tons. These reports shall be submitted by January 15 and July 15 of each year and shall cover the previous six calendar months.

The permittee shall submit annual reports that summarize the following information:

- 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)."
- b. The total VOC emissions for this emissions unit, in tons.

These reports shall be submitted by January 31st of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a. Emission Limitation -
8.07 tons per month VOC individual emissions limitation for emissions unit L001, with the combined emission rate from emissions units L001, L002 and L003 not to exceed 8.07

Emissions Unit ID: L001

tons per month

Applicable Compliance Method -

Compliance shall be determined in accordance with the record keeping required in Section A.III.6 of this permit.

1.b. Emission Limitation -

96.78 tons per year (TPY) VOC as the individual emissions limitation for emissions unit L001, with the combined emission rate from emissions units L001, L002 and L003 not to exceed 96.78 tons per year

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the record keeping in Section A.III.6 of this permit and shall be the summation of the 12 monthly VOC emission rates for the calendar year.

2. The permittee shall conduct an initial test of the wind speed and of room parameters using the following procedures:

a. Determine and measure the maximum wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine by slowly rotating a velometer or similar device until the maximum speed is located.

b. Orient the velometer or similar device in the direction of the wind current at each of the four corners of the machine and perform the following:

i. Record the reading for each corner.

ii. Average the values obtained at each corner and record the average wind speed.

3. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

PTE_i = the potential to emit for the solvent cleaning machine i (kilograms

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solvent per year).

$H_i =$ hours of operation for solvent cleaning machine i (hours per year).

$=$ 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i =$ the working mode uncontrolled emission rate (kilograms per square meter per hour).

$=$ 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

$=$ 1.12 kilograms per square meter per hour for in-line cleaning machines.

$SAI_i =$ solvent/air interface area of solvent cleaning machine i (square meters).

Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

$SAI =$ the solvent/air interface area (square meters).

$Vol =$ the cleaning capacity of the solvent cleaning machine (cubic meters).

- c. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.
4. The permittee shall determine the idling emission rate of the solvent cleaning machine using Reference Method 307 in 40 CFR part 63, Appendix A.

VI. Miscellaneous Requirements

1. Chapter 31 modification of 08-02356 to combine the allowable emission limitation for L001, L002 and L003

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
L001 - TCE Vapor Degreaser (carburizing area)		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Trutek
PTI A

Emissions Unit ID: L002

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
L002 - TCE Vapor Degreaser (tufftride area), with idling emission limit, 1.0 freeboard ratio, and reduced room draft	40 CFR, Part 63, Subpart T OAC rule 3745-31-05(A)(3) PTI 08-2356	See Sections A.I.2 and A.II. The individual maximum volatile organic compounds (VOC) emission rates for emissions unit L002 shall not exceed 8.07 tons per month and 96.78 tons per year; with the combined emission rates for emissions units L001, L002 and L003 not to exceed 8.07 tons per month and 96.78 tons per year VOC. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart T.

* modification

2. Additional Terms and Conditions

- 2.a The permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilogram per hour per square meter (0.045 pound per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465 (a) and 40 CFR 63, Appendix A.
- 2.b The permittee shall perform the following activities:
 - a. Conduct an initial performance test to demonstrate compliance with the applicable idling emission limit and to establish parameters that will be monitored to

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- demonstrate compliance. The initial performance test that demonstrated compliance was completed on March 24, 2000.
- b. Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - c. Operate the solvent cleaning machine within the parameters identified in the initial performance test.
- 2.c** The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.
- 2.d** The permittee shall ensure that the air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, is no greater than 100 degrees Fahrenheit.
- 2.e** The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
- a. The solvent cleaning machine shall be designed or operated to meet the following control equipment or technique requirements: Use of 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 the "Monitoring and/or Recordkeeping Requirements" section 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 the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - b. The solvent cleaning machine shall have 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.
 - c. The solvent 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.
 - d. 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.

- e. The solvent cleaning machine shall have a primary condenser.

II. Operational Restrictions

1. The permittee shall meet all of the following required work and operational practices:
 - a. Control air disturbances across the solvent cleaning machine opening(s) by incorporating the following control equipment or techniques: The permittee shall employ a reduced room draft that ensures that 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 does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall also 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 the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - b. The parts baskets or the parts being cleaned in 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 (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - 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 District 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 cleaning machine and its associated controls shall be maintained as

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recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (appropriate District Office or local air agency) 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 Director (appropriate District 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.
- l. Sponges, fabric, wood, and paper products shall not be cleaned.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain records of the initial performance test, completed on March 24, 2000, including the idling emission rate and values of the monitoring parameters measured during the test. These records shall be maintained for the lifetime of the solvent cleaning machine.
- 2. The permittee shall conduct an initial monitoring test of the wind speed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:
 - a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - i. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
 - ii. Orient a velometer in the direction of the wind current at each of the four corners of the machine.
 - iii. Record the reading for each corner.
 - iv. Average the values obtained at each corner and record the average wind speed.
 - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

Emissions Unit ID: L002

3. The permittee shall conduct monitoring and record the results on a weekly basis for the air blanket temperature by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
4. 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.
 - d. If the permittee can demonstrate to the satisfaction of the Director (appropriate District Office or local air agency) 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.
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. 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.
6. 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 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made,

Emissions Unit ID: L002

and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

- c. Estimates of annual consumption of trichloroethylene for the solvent cleaning machine.
7. The permittee shall record the following information each month for the vapor degreaser:
- a. The amount of trichloroethylene solvent added to the tank, in gallons.
 - b. The total amount of waste solvents removed for disposal, in gallons.
 - c. The trichloroethylene content of the waste removed, in percent by volume.
 - d. The amount of trichloroethylene solvent sent off site for disposal (b x c), in gallons.
 - e. The total VOC emissions, in tons, calculated as follows:

$$E = ((L_s - L_w) \times D) / 2000$$

where:

E = volatile organic compound emission rate (tons/month)

L_s = liquid volume of trichloroethylene solvent employed each month (gallons)

L_w = liquid volume of trichloroethylene solvent sent off site as waste (gallons) determined from tests conducted using EPA reference method 25d, an equivalent method approved by the Director or by engineering calculations included in the compliance report.

D = density of trichloroethylene solvent (pounds/gallon)

IV. Reporting Requirements

- 1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5 (d) (1) of subpart A, with the following revisions and additions:
 - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
 - b. The report shall include the anticipated compliance approach for the solvent cleaning machine.

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- c. The report shall include an estimate of the trichloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5 (d) (1) (ii) (H), subpart A.

*The initial notification report for this emissions unit was submitted on September 8, 1995 and a revised report was received on February 1, 2001.

2. The permittee shall submit an initial statement of compliance no later than 150 days after December 2, 1997. Each initial statement of compliance shall contain the following:
 - 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 used to achieve compliance.
 - d. A list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date for each piece of control equipment required to be monitored.
 - e. Conditions to maintain the wind speed requirements as described in the "Additional Terms and Conditions" section of this permit.

*The initial statement of compliance for this emissions unit was submitted on April 27, 1999 and a revised statement was received on February 1, 2001.

3. The permittee shall submit a test report for tests of idling emissions meeting the specifications in Method 307 of 40 CFR Part 63, Appendix A. This report shall comply with the following requirements:
 - a. The test must be conducted on the same specific model solvent cleaning machine used at the facility. The test can be done by the permittee of the affected machine or can be supplied by the vendor of that solvent cleaning machine or a third party. If a solvent cleaning machine vendor or a third party test report is used to demonstrate compliance, the following requirements shall be met:
 - i. The report shall include the following for the solvent cleaning machine tested: name of person(s) or company that performed the test, model name, the date the solvent cleaning machine was tested, serial number, and a diagram of the solvent cleaning machine tested.

Emissions Unit ID: L002

- ii. The permittee shall comply with the following requirements:
 - (a) Submit a statement by the solvent cleaning machine vendor that the unit tested is the same as the unit the report is being submitted for.
 - (b) Demonstrate to the satisfaction of the Director (appropriate District Office or local air agency) that the trichloroethylene emissions from the solvent cleaning machine for which the test report is being submitted are equal to or less than the trichloroethylene emissions from the solvent cleaning machine in the vendor test report.
- b. The report must clearly state the monitoring parameters, monitoring frequency and the delineation of exceedances for each parameter.

*The idling emissions test report for this emissions unit was received on April 14, 2000.

- 4. The permittee shall submit an exceedance report on a semiannual basis. If any of the following exceedances occur, the permittee shall begin to submit these exceedance reports on a quarterly basis until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (appropriate District Office or local air agency):
 - a. If no operating conditions or room parameters were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - b. 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 days of detection.
 - c. If the temperature of the air blanket, measured at the center of the air blanket, was greater than 100 degrees Fahrenheit during idling mode, and no correction was made within 15 days of detection.
 - d. If the hoist speed exceeded 3.4 meters per minute (11 feet per minute) and no correction was made within 15 days of detection.
- 5. Each exceedance report shall be delivered or post marked 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

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monitored parameters have returned to acceptable levels.

- b. If no exceedance has occurred, a statement to that effect shall be submitted.
6. The permittee may receive approval of less frequent reporting if all 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 recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions.
 - c. The Director (appropriate District Office or local air 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.
 7. The permittee shall submit semiannual deviation (excursion) reports that identify any exceedances of the monthly VOC emission limitation of 8.07 tons. These reports shall be submitted by January 15 and July 15 of each year and shall cover the previous six calendar months.
 8. The permittee shall submit annual reports that summarize the following information:
 - 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)."
 - b. The total VOC emissions for this emissions unit, in tons.

These reports shall be submitted by January 31st of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a. Emission Limitation -
8.07 tons per month VOC individual emissions limitation for emissions unit L002, with the combined emission rate from emissions units L001, L002 and L003 not to exceed 8.07 tons per month

Applicable Compliance Method -
 Compliance shall be determined in accordance with the record keeping required in Section A.III.6 of this permit.

- 1.b Emission Limitation -
 96.78 tons per year (TPY) VOC as the individual emissions limitation for emissions unit L002, with the combined emission rate from emissions units L001, L002 and L003 not to exceed 96.78 tons per year VOC

Applicable Compliance Method -
 Compliance with the annual limitation shall be based upon the record keeping in Section A.III.6 of this permit and shall be the summation of the 12 monthly VOC emission rates for the calendar year.

2. The permittee shall conduct an initial test of the wind speed and of room parameters using the following procedures:
- a. Determine and measure the maximum wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine by slowly rotating a velometer or similar device until the maximum speed is located.
 - b. Orient the velometer or similar device in the direction of the wind current at each of the four corners of the machine and perform the following:
 - i. Record the reading for each corner.
 - ii. Average the values obtained at each corner and record the average wind speed.
3. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:
- a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

PTE_i = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).

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H_i = hours of operation for solvent cleaning machine i (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

SAI = the solvent/air interface area (square meters).

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

- c. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.
4. The permittee shall determine the idling emission rate of the solvent cleaning machine using Reference Method 307 in 40 CFR part 63, Appendix A.

VI. Miscellaneous Requirements

1. Chapter 31 modification of 08-02356 to combine the allowable emission limitation for L001, L002 and L003

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Emissions Unit ID: L002

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
L002 - TCE Vapor Degreaser (tufftride area)		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
L003 - TCE Vapor Degreaser (carburizing area), with refrigeration device, 1.0 freeboard ratio, and reduced room draft * modification	40 CFR, Part 63, Subpart T OAC rule 3745-31-05(A)(3) PTI 08-3533	See Sections A.I.2 and A.II. The individual maximum volatile organic compounds (VOC) emission rates for emissions unit L003 shall not exceed 8.07 tons per month and 96.78 tons per year; with the combined emission rates for emissions units L001, L002 and L003 not to exceed 8.07 tons per month and 96.78 tons per year VOC. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart T.

2. Additional Terms and Conditions

- 2.a The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.
- 2.b 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.
- 2.c The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
 - a. The solvent cleaning machine shall be designed or operated to meet the following control equipment or technique requirements: Use of 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

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not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section 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 the "Monitoring and/or Recordkeeping Requirements" section of this permit.

- b. The solvent cleaning machine shall have 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.
- c. The solvent 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.
- d. 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.
- e. The solvent cleaning machine shall have a primary condenser.

II. Operational Restrictions

1. The permittee shall meet all of the following required work and operational practices:
 - a. Control air disturbances across the solvent cleaning machine opening(s) by incorporating the following control equipment or techniques: The permittee shall employ a reduced room draft that ensures that 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 does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall also 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 the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - b. The parts baskets or the parts being cleaned in 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

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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 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 District 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 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 Director (appropriate District Office or local air agency) 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 Director (appropriate District 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.
- l. Sponges, fabric, wood, and paper products shall not be cleaned.

III. Monitoring and/or Recordkeeping Requirements

1. 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.
2. The permittee shall conduct an initial monitoring test of the wind speed and of room parameters,

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quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:

- a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - i. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
 - ii. Orient a velometer in the direction of the wind current at each of the four corners of the machine.
 - iii. Record the reading for each corner.
 - iv. Average the values obtained at each corner and record the average wind speed.
 - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
3. 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.
 - d. If the permittee can demonstrate to the satisfaction of the Director (appropriate District Office or local air agency) 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.
4. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:

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- 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.
5. 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 40 CFR 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.
 - c. Estimates of annual consumption of trichloroethylene for the solvent cleaning machine.
6. The permittee shall record the following information each month for the vapor degreaser:
- a. The amount of trichloroethylene solvent added to the tank, in gallons.
 - b. The total amount of waste solvents removed for disposal, in gallons.
 - c. The trichloroethylene content of the waste removed, in percent by volume.
 - d. The amount of trichloroethylene solvent sent off site for disposal (b x c), in gallons.
 - e. The total VOC emissions, in tons, calculated as follows:

$$E = ((L_s - L_w) \times D) / 2000$$

where:

E = volatile organic compound emission rate (tons/month)

L_s = liquid volume of trichloroethylene solvent employed each month (gallons)

L_w = liquid volume of trichloroethylene solvent sent off site as waste (gallons) determined

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from tests conducted using EPA reference method 25d, an equivalent method approved by the Director or by engineering calculations included in the compliance report.

D = density of trichloroethylene solvent (pounds/gallon)

IV. Reporting Requirements

1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5 (d) (1) of subpart A, with the following revisions and additions:
 - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
 - b. The report shall include the anticipated compliance approach for the solvent cleaning machine.
 - c. The report shall include an estimate of the annual trichloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5 (d) (1) (ii) (H), subpart A.

*The initial notification report for this emissions unit was submitted on April 27, 1999 and a revised report was received on February 1, 2001.

2. The permittee shall submit a compliance report no later than 150 days after startup. 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 statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with 40 CFR part 63.
 - d. The compliance approach for the solvent cleaning machine.

*The initial statement of compliance for this emissions unit was submitted on April 27, 1999 and a revised statement was received on February 1, 2001.

3. The permittee shall submit an exceedance report on a semiannual basis. If any of the following exceedances occur, the permittee shall begin to submit these exceedance reports on a quarterly basis until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (appropriate District Office or local air agency):
 - a. If no operating conditions or room parameters were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping" section of this permit.
 - b. 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 days of detection.
 - c. 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.

Each exceedance report shall be delivered or post marked 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.
- b. If no exceedance has occurred, a statement to that effect shall be submitted.

The permittee may receive approval of less frequent reporting if all 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 recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions.
 - c. The Director (appropriate District Office or local air 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.
4. The permittee shall submit semiannual deviation (excursion) reports that identify any exceedances of the monthly VOC emission limitation of 8.07 tons. These reports shall be submitted by January

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15 and July 15 of each year and shall cover the previous six calendar months.

5. The permittee shall submit annual reports that summarize the following information:
 - 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)."
 - b. The total VOC emissions for this emission unit, in tons.

These reports shall be submitted by January 31st of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a. Emission Limitation -
8.07 tons per month VOC individual emissions limitation for emissions unit L003, with the combined emission rate from emissions units L001, L002 and L003 not to exceed 8.07 tons per month

Applicable Compliance Method -
Compliance shall be determined in accordance with the record keeping required in Section A.III.6 of this permit.
 - 1.b. Emission Limitation -
96.78 tons per year (TPY) VOC as the individual emissions limitation for emissions unit L003, with the combined emissions units L001, L002 and L003 not to exceed 96.78 tons per year

Applicable Compliance Method -
Compliance with the annual limitation shall be based upon the record keeping in Section A.III.6 of this permit and shall be the summation of the 12 monthly VOC emission rates for the calendar year.
2. The permittee shall conduct an initial test of the wind speed and of room parameters using the following procedures:
 - a. Determine and measure the maximum wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine by slowly rotating a velometer or similar device until the maximum speed is located.
 - b. Orient the velometer or similar device in the direction of the wind current at each of the four corners of the machine and perform the following:
 - i. Record the reading for each corner.
 - ii. Average the values obtained at each corner and record the average wind speed.
3. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:
 - a. Determine the potential to emit for each individual solvent cleaning machine using the

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following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

PTE_i = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).

H_i = hours of operation for solvent cleaning machine i (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

SAI = the solvent/air interface area (square meters).

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

- c. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

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VI. Miscellaneous Requirements

1. Chapter 31 modification of 08-03533 to combine the allowable emission limitation for L001, L002 and L003

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
L003 - TCE Vapor Degreaser (carburizing area)		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None