



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

3/20/2013

MICHAEL MCDIVITT  
ETCHED METAL CO.  
30200 SOLON INDUSTRIAL PKWY  
SOLON, OH 44139

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318537905  
Permit Number: P0110063  
Permit Type: Renewal  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

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

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

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

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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: CDAQ



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ETCHED METAL CO.**

Facility ID:	1318537905
Permit Number:	P0110063
Permit Type:	Renewal
Issued:	3/20/2013
Effective:	3/20/2013
Expiration:	3/20/2023





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
ETCHED METAL CO.

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**Final Permit-to-Install and Operate**  
ETCHED METAL CO.  
**Permit Number:** P0110063  
**Facility ID:** 1318537905  
**Effective Date:** 3/20/2013

## Authorization

Facility ID: 1318537905  
Application Number(s): A0043964  
Permit Number: P0110063  
Permit Description: PTIO renewal permit for one photo resist Binks spray booth (K004), etching room including anodizing line and seal wash-off line (P002), screen washer (P004), and a Painted Sheet Hi-lite Area (P005). PTI 13-3584 issued 9/1/1999 for K004. PTI 13-3068 issued 6/5/1996 for P004. PTI 13-04169 issued 10/14/2003 for P005.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 3/20/2013  
Effective Date: 3/20/2013  
Expiration Date: 3/20/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ETCHED METAL CO.  
30200 INDUSTRIAL PARKWAY  
Solon, OH 44139

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

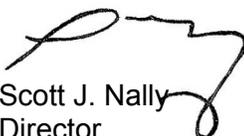
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erievue Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110063

Permit Description: PTIO renewal permit for one photo resist Binks spray booth (K004), etching room including anodizing line and seal wash-off line (P002), screen washer (P004), and a Painted Sheet Hi-lite Area (P005). PTI 13-3584 issued 9/1/1999 for K004. PTI 13-3068 issued 6/5/1996 for P004. PTI 13-04169 issued 10/14/2003 for P005.

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

<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Spray Paint Booth #4
Superseded Permit Number:	13-3584
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Etching Room
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Screen Cleaner
Superseded Permit Number:	13-3068
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Hi-Lite Area
Superseded Permit Number:	13-04169
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
ETCHED METAL CO.  
**Permit Number:** P0110063  
**Facility ID:** 1318537905  
**Effective Date:** 3/20/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
ETCHED METAL CO.  
**Permit Number:** P0110063  
**Facility ID:** 1318537905  
**Effective Date:** 3/20/2013

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



**Final Permit-to-Install and Operate**

ETCHED METAL CO.

**Permit Number:** P0110063

**Facility ID:** 1318537905

**Effective Date:** 3/20/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
ETCHED METAL CO.  
**Permit Number:** P0110063  
**Facility ID:** 1318537905  
**Effective Date:** 3/20/2013

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



**1. K004, Spray Paint Booth #4**

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

Photo resist spray booth - application of photo resist to metal and plastic plates.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 13-3584, issued 9/1/1999)	Volatile organic compound (VOC) emissions shall not exceed 4.1 tons per year from all coatings employed in this emissions unit.
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)a. below.

(2) **Additional Terms and Conditions**

a. The permittee shall not use more than 3 gallons of coating per day total for the coating of both miscellaneous metal and plastic parts.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11(B) is not applicable.



- c. The coating usage for the emissions unit is less than five gallons of coating per day for the spray booth. Therefore, pursuant to OAC rule 3745-17-11(A)(1)(i), this rule does not apply to the above mentioned emission unit.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation. The dry particulate filter shall be maintained in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event that the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
  - a. the name and identification number of each coating employed;
  - b. the amount, in gallons, of each coating employed;
  - c. the total amount, in gallons, of all coatings employed;
  - d. the VOC content of each coating, in pounds per gallon; and
  - e. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day (summation of b x d for each coating).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall notify the Cleveland DAQ, in writing, of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the exceedance occurs.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

3 gallons per day total coating for the coating of both miscellaneous metal and plastic parts.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping requirements established in d)(1).

b. Emission Limitation:

VOC emissions shall not exceed 4.1 tons/year from all coating employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping requirements established in d)(1) by summing the daily emissions for each calendar year and divide by 2,000 lbs/ton.

g) Miscellaneous Requirements

(1) The cleanup material used in this spray boot is acetone which is not a VOC material.



**2. P002, Etching Room**

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

Etching room including sulfuric acid anodizing line, seal wash off line, and hydrochloric acid aluminum etching machines.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Sulfuric acid (H <sub>2</sub> SO <sub>4</sub> ) as particulate emissions (PE) shall not exceed 0.551 lb/hr from the stack serving this emissions unit.

(2) **Additional Terms and Conditions**

a. The above pound per hour limitation in this permit was established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop recordkeeping and reporting requirements to ensure compliance with this limitation.



- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air quality (Cleveland DAQ) by the due date identified in the Authorization sections of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "eBusiness Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed twenty percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.
    - b. Emissions Limitation:

Sulfuric acid (as PE) emissions shall not exceed 0.551 lbs/hr.

Applicable Compliance Method:

If required, compliance with the lb/hr limitation shall be demonstrated through emissions tests in accordance with USEPA Reference Methods 1 through 5 of 40 CFR Part 60, Appendix A for PE and Method 8 as described in 40 CFR Part 60, Appendix A for sulfuric acid.
- g) Miscellaneous Requirements
  - (1) None.



**3. P004, Screen Cleaner**

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

Cold Cleaner - cleans residual ink from printing screens. Emission unit consists of cleaning solution reservoir, screen holder, and air pressurized flow through brush for cleaning the screens.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 13-3068, issued 6/5/1996)	Volatile organic compound (VOC) emissions shall not exceed 0.72 pound per hour and 3.15 tons per year from this emissions unit.
b.	OAC rule 3745-21-09(O)(2)	See b)(2)a. through b.)(2)c. below. Operational restrictions and work practice requirements, see c)(1) below.



- (2) Additional Terms and Conditions
  - a. The cold cleaner shall employ a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area, which has an open drain of less than 16 square inches, back to the reservoir, and provided the solvent is not heated above 120 degrees Fahrenheit.
  - b. The cold cleaner shall be equipped with a device for draining the cleaned parts.
  - c. The solvent material employed in the cold cleaner shall have a vapor pressure that does not exceed 0.019 psi measured at 68 degrees Fahrenheit.
- c) Operational Restrictions
  - (1) The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
    - a. a permanent, legible, conspicuous label, summarizing the operating requirements shall be maintained near or attached to the cold cleaner;
    - b. waste solvent shall be stored in covered containers;
    - c. the cover shall remain closed whenever parts are not being handled in the cleaner;
    - d. cleaned parts shall drain in the unit until dripping ceases;
    - e. if used, a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) shall be supplied at a pressure that does not exceed 10 pounds per square inch gauge; and
    - f. porous and/or absorbent materials shall not be cleaned in the cold cleaner.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain records of the following information:
    - a. the date that each solvent was purchased;
    - b. the name, company identification, and chemical composition of the solvent;
    - c. the vapor pressure of each solvent (pounds per square inch absolute) measured at 68 degrees Fahrenheit as determined by ASTM D2879-97; and
    - d. the maximum temperature at which the solvent is maintained, if not maintained at room temperatures.
  - (2) The permittee shall maintain records of the following information, collected at the end of each year:



- a. the total amount, in gallons, of the cleaning solvent added to the cold cleaner or the amount purchased for use in the emissions unit during the year;
- b. the total amount, in gallons, of solvent collected for disposal and/or recovery and shipped off-site during the year;
- c. the VOC content of the solvent, in pounds per gallon; and
- d. the estimated VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, multiplied by the VOC content of the solvent, adjusting the units to calculate the emissions in tons/year.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall include in the annual PER information that identifies any period of time during which a solvent with a vapor pressure greater than 0.019 psi measured at 68 degrees Fahrenheit was used or the solvent was heated above one hundred and twenty degrees Fahrenheit (without meeting the control requirements of OAC rule 3745-21-09(O)(2)(c)); and any period of time during which the cold cleaner was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compound emissions shall not exceed 0.72 lb/hr from this emissions unit.

Applicable Compliance Method:

Compliance with the above limitation shall be determined through the recordkeeping requirements located in d)(2) and divide the annual lbs/year by the actual hours of operation per year.



b. Emission Limitation:

Volatile organic compound emissions shall not exceed 3.15 TPY from this emissions unit.

Applicable Compliance Method:

Compliance with the above limitation shall be determined through the recordkeeping requirements located in d)(2).

- (2) Formulation data shall be used to determine the VOC content of the solvent used in the above mentioned cold cleaner.

g) Miscellaneous Requirements

- (1) None.



**4. P005, Hi-Lite Area**

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

Painted Sheet Plate Hi-Lite Area (cold cleaning room with various small wash basins filled with solvent for stripping excess paint from metal sheets).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 13-04169, issued 10/14/2003)	Volatile organic compound emissions shall not exceed 3.89 tons per year from this emissions unit.
b.	OAC rule 3745-21-09(O)(2)	See b)(2)a. through b)(2)d. below. Operational restrictions and work practice requirements, see c)(1) below.

(2) Additional Terms and Conditions

a. The cold cleaning tanks shall be fitted with a cover, which shall remain closed at all times, except when parts are being handled or solvent is being added or removed.



- b. The cold cleaning tanks shall be equipped with a device for the draining of cleaned parts.
- c. Solvents used to strip excess paint from the metal sheet plates in the "Hi-Lite" area shall be maintained at room temperature to avoid evaporation.
- d. The solvent material employed in the cold cleaner shall have a vapor pressure that does not exceed 0.019 psi measured at 68 degrees Fahrenheit.

c) Operational Restrictions

- (1) The emissions unit shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. a permanent, legible, and conspicuous label, summarizing the operating requirements shall be maintained near or attached to the cold cleaning tanks;
  - b. waste solvent shall be stored in covered containers;
  - c. tank covers shall remained closed whenever parts are not being handled in the cleaning tanks;
  - d. cleaned parts shall drain until dripping ceases;
  - e. if used, a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) shall be supplied at a pressure that does not exceed 10 pounds per square inch gauge; and
  - f. porous and/or absorbent materials shall not be cleaned in the cold cleaner.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. the date that each solvent was purchased;
  - b. the name, company identification, and chemical composition of the solvent;
  - c. the vapor pressure of each solvent (pounds per square inch absolute) measured at 68 degrees Fahrenheit as determined by ASTM D2879-97;
  - d. the VOC content of each solvent material employed, in pounds per gallon;
  - e. the amount, in gallons, of each solvent material employed;
  - f. the total amount of solvent material taken off-site for disposal, in gallons; and
  - g. the total VOC emissions from the solvent material in pounds per month, calculated as the summation of [(d x e) -f] for all solvent materials.



- (2) The permittee shall collect and record the total VOC emissions from all materials employed, sum of the monthly emissions per d)(1), for the purpose of determining annual emissions.
- (3) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted one hour maximum ground level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Stoddard Solvent

TLV (ug/m3): 434,190

Maximum Hourly Emission Rate (lbs/hour): 8 lbs/hour

Predicted One-Hour Maximum Ground Level Concentration (ug/m3): 44.59

MAGLC (ug/m3): 10,337.91

Pollutant: Toluene

TLV (ug/m3): 118,400

Maximum Hourly Emission Rate (lbs/hour): 4.8 lbs/hour

Predicted One-Hour Maximum Ground Level Concentration (ug/m3): 26.76

MAGLC (ug/m3): 4,485.83

Pollutant: Acetone

TLV (ug/m3): 3,146,000

Maximum Hourly Emission Rate (lbs/hour): 3.2 lbs/hour

Predicted One-Hour Maximum Ground Level Concentration (ug/m3): 17.84

MAGLC (ug/m3): 74,905.05

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact those parameters, the permittee shall conduct an evaluation to determine that the Air Toxic Policy will be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV) as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV modeled;



- b. changes in the composition of materials, or use of new raw materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, change in stack height, changes in the stack height, changes in the stack diameter, etc.).
- (5) If the permittee determines that the “Air Toxic Policy” will be satisfied for the above changes, the Ohio EPA will not consider the changes to be a modification under OAC rule 3745-31-01, and a modification of the existing permit to install will not be required. If the changes are defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- (6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions units will still satisfy the Air Toxics Policy”:
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA’s “e-Business Center: Air Services” although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall include in the annual PER information that identifies any period of time during which a solvent with a vapor pressure greater than 0.019 psi measured at 68 degrees Fahrenheit was used or the solvent was heated above one hundred and twenty degrees Fahrenheit (without meeting the control requirements of OAC rule 3745-21-09(O)(2)(c); and any period of time during which the cold cleaner was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

3.89 tons per year VOC

Applicable Compliance Method:

Compliance shall be determined based upon recordkeeping requirements specified in d)(1) and by the following equations:

For solvent stripping material:

$[(\text{Monthly amount of each solvent employed in gallons}) - (\text{Monthly amount of each solvent taken off site for disposal in gallons})] \times [(\text{VOC content of that solvent in pounds per gallon})] = \text{monthly VOC emissions.}$

$(\text{Sum of the monthly VOC emissions in pounds for all solvents employed}) = \text{total actual VOC emissions in pounds per month.}$

$\text{Sum of the total actual monthly VOC emissions} = \text{annual VOC emissions in pounds per year.}$

$\text{Sum of the total actual monthly VOC emissions} / 2,000 \text{ lbs/ton} = \text{annual VOC emissions in tons per year.}$

g) Miscellaneous Requirements

(1) None.