



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL  
STARK COUNTY  
Application No: 15-01403**

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
40 CFR Part 63, Subpart T	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE:** 3/15/2001

R.W. Screw  
Jeff Grace  
P.O. Box 704 999 Oberlin Rd., S.W.  
Massillon, OH 44648

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

Canton LAA



**Permit To Install  
Terms and Conditions**

**Issue Date: 3/15/2001  
Effective Date: 3/15/2001**

**FINAL PERMIT TO INSTALL 15-01403**

Application Number: 15-01403  
APS Premise Number: 1576131761  
Permit Fee: **\$200**  
Name of Facility: R.W. Screw  
Person to Contact: Jeff Grace  
Address: P.O. Box 704 999 Oberlin Rd., S.W.  
Massillon, OH 44648

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**999 Oberlin Rd., SW  
Massillon, Ohio**

Description of proposed emissions unit(s):  
**Vapor degreaser utilizing trichloroethylene.**

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

## 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.11 below if no deviations occurred during the quarter.

- 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**

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 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 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 thirty (30) 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.

**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 Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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. 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.

**5. 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.

**6. 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.

**7. 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.

**8. Applicability**

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

**9. 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.

**10. Additional Reporting Requirements When There Are No Deviations of Federally 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**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
Trichloroethylene	8

**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

**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 - Trichloroethylene Vapor Degreaser	OAC rule 3745-31-05(A)(3)	0.67 ton trichloroethylene (TCE)/month, 8 tons TCE/year and Compliance with NESHAP 40 CFR Part 63, Subpart T
	NESHAP-40 CFR PART 63 Subpart T	See section A.2.a.
	OAC rule 3745-21-09(O)	See section A.2.b.
	OAC rule 3745-35-07(B) Synthetic Minor Restriction	See section A.2.c.

**2. Additional Terms and Conditions**

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

- i. The permittee shall ensure that the chilled air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- ii. The permittee shall maintain a free board with a freeboard ratio equal to or greater than 1.0.
- iii. The permittee shall employ a cover that may be readily opened or closed, shall cover the cleaning degreaser openings completely when in place, and is free of cracks, holes and other defects.
- iv. This emissions unit shall be equipped with the following:
  - aa. An automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute(11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

- ab. A device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
  - ac. A primary condenser and a vapor level control device that shuts off sump heat if the vapor level rises above the height of the primary condenser.
  - v. This emissions unit shall not employ a lip exhaust system.
- 2.b** Since this degreaser is subject to 40 CFR Part 63, Subpart T, it is exempted from rule 3745-21-09, paragraphs (O)(2) through (O)(5).
- 2.c** The usage of Hazardous Air Pollutants(HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 0.67 tons/month for any individual HAP. The term usage assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used will evaporate.

## **B. Operational Restrictions**

1. The permittee shall meet all of the following required work and operational practices:
  - a. The cover shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that does not require it to be in place
  - b. The parts baskets or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.
  - c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
  - d. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Director (appropriate field office or local air agency).
  - e. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
  - f. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
  - g. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

- h. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- i. The solvent degreaser and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (appropriate field office or local air agency).
- j. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Director (appropriate field office or local air agency).
- k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
- l. Sponges, fabric, wood, and paper products shall not be cleaned.

**C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
  - a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
  - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
  - c. Monthly records of the halogenated HAP solvent content and quantity in the degreaser tank.
- 2. The permittee shall maintain monthly records of the following information. These records shall be kept for a period of not less than 5 years:
  - a. The identification of the degreasing solvent employed.
  - b. The number of gallons of degreasing solvent used.
  - c. The number of gallons of degreasing solvent waste.
  - d. The temperature of the solvent within the distilling apparatus at the beginning and the end of each calendar month and before and after the removal of solvent from the distilling apparatus as waste.

- e. The average monthly TCE content, in percent by volume, of the solvent waste. The TCE percent by volume shall be determined by using a boiling point vs. concentration table provided by the manufacturer of the solvent. The average percent by volume of TCE in the solvent waste shall be determined based on the final boiling temperature of the solvent wasted from the distilling apparatus just prior to cleaning of the distilling apparatus.
  - f. The monthly HAPs emission rate, in tons per month. See section E.1.a for the calculation method.
3. The permittee shall conduct a monthly visual inspection of the cover to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed and if free of cracks holes, and other defects. The permittee shall maintain records of the findings of the inspections which specify the date and time of the inspection, whether the cover is opening and closing properly, whether the cover completely covers the openings of the cleaning machine and if the cover is free of any cracks, holes, and other defects. If the results of the inspection indicate that the cover is not free of cracks, holes and other defects, then the permittee shall make any necessary repairs within 15 days of detection and maintain a record of when the repairs were completed.
  4. The permittee shall conduct monthly monitoring of the speed of the hoist used to lower and raise parts from the degreaser. The hoist speed shall be determined by measuring the time it takes the hoist to travel a measured distance. The speed is equal to the distance in meters or feet divided by the time in minutes.
  5. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode. If the results of the monitoring indicate a temperature exceeding the allowable limit specified in section A.2.a, the permittee shall make any necessary adjustments or repairs in order to reestablish the required temperature within 15 days of detection. The temperature shall be remeasured immediately upon completion of the adjustment or repair to demonstrate that the emissions unit is in compliance. The permittee shall maintain a record of the day when the adjustment was completed and the unit was in compliance.
  6. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent degreaser:
    - a. The results of control device monitoring required in this section of the permit.
    - 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.

#### **D. Reporting Requirements**

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

- a. A signed statement from the facility owner or their designee stating that “All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 63.463 (d)(10).”
  - b. An estimate of solvent consumption during the reporting period.
2. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Canton LAA, which includes the following information for this emissions unit:
- a. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent’s boiling point, and no correction was made within 15 days of detection.
  - b. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
  - c. An identification of each month during which the emissions of an individual HAP from the facility exceeded 1340 lbs.
  - d. If no exceedance has occurred, a statement to that effect shall be submitted.
  - e. If the idling-mode cover is not in place when parts are not in the degreaser or the cover does not completely cover the degreaser.
  - f. If the cover is not free of holes, cracks, or other defects and no correction was made within 15 days of detection.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accordance with the following method(s).
  - a. Emissions Limitation:  
0.67 ton/month trichloroethylene (HAP)

Applicable Compliance Method:

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

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

E = HAP emission rate (ton/month)

L<sub>s</sub> = liquid volume of TCE solvent employed each month (gallons)

L<sub>w</sub> = liquid volume of TCE solvent waste (gallons)

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

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

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

- b. Emissions Limitation:  
8 tons/year compounds

Applicable Compliance Method:

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

## F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. In accordance with 40 CFR 63.469, upon written application, the Administrator may approve the use of equipment or procedures after they have been satisfactorily demonstrated to be equivalent, in terms of reducing emissions of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform to the atmosphere, to those prescribed for compliance within a specified paragraph of 40 CFR Part 63 Subpart T. The application must contain a complete description of the equipment or procedure and the proposed equivalency testing procedure and the date, time, and location scheduled for the equivalency demonstration

**NEW SOURCE REVIEW FORM B**

PTI Number: 15-01403

Facility ID: 1576131761

FACILITY NAME R.W. Screw

FACILITY DESCRIPTION Vapor degreaser utilizing trichloroethylene CITY/TWP Massillon

SIC CODE 3451 SCC CODE 30101801 EMISSIONS UNIT ID L001

EMISSIONS UNIT DESCRIPTION Trichloroethylene Vapor Degreaser

DATE INSTALLED 6/15/1977

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	Trichloroethylene	0.58	7	0.67	8

## APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? 40 CFR Part

PSD? No

OFFSET POLICY? No

63, Subpart T

## WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** Compliance with 40 CFR Part 63, Subpart T as well as monthly and annual TCE emission limitations of 0.67 tons TCE/month and 8 tons TCE/year, respectively.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

**NEW SOURCE REVIEW FORM B**

PTI Number: 15-01403

Facility ID: 1576131761

FACILITY NAME R.W. Screw

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FACILITY DESCRIPTION Vapor degreaser utilizing trichloroethylene CITY/TWP Massillon

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IDENTIFY THE AIR CONTAMINANTS: The emissions unit was installed in 1977 prior to the Air Toxics Policy.

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**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
Calculations (required)	<input checked="" type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

R.W. Screw currently operates one trichloroethylene vapor degreaser(emissions unit L001). This is the only HAP source at this facility. The emission unit is regulated under a PTI, number 15-1024 with a annual limit of 12 tons trichloroethylene/year. This limit also reflects the unit's PTE. The degreaser is subject to 40 CFR Part 63, Subpart T(halogenated degreasing agent MACT Std.).

The company's actual emissions have been documented at less than 10 tons/year. The company has requested a synthetic minor PTI modification of PTI 15-1024 to lower the allowable emissions to below 10 tons/year in order to defer Title V permitting until 2004.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or  Netting Determination  
 Permit To Install ENTER PTI NUMBER HERE

**A. Source Description**

This emissions unit includes one Trichloroethylene (HAP) Vapor Degreaser. The HAP PTE has been calculated as 12 tons/year. Since the company's actual emissions are documented at less than 10 tons/year, the company is requesting a limit below the 10 ton/year threshold. This permit to install is written to limit the HAP on a monthly basis in lieu of a rolling 12 month summation.

**B. Facility Emissions and Attainment Status**

Annual emissions of Trichloroethylene(TCE) are equal to the difference in what was used and what was disposed of throughout the year. This assumes the difference evaporates.

L001:  $\{(\text{Maximum gallons of TCE used throughout the year}) - [(\text{volume fraction of TCE in degreaser waste}) \times (\text{Minimum gallons of degreaser waste disposed of throughout the year})]\} \times 12.2 \text{ pounds TCE/gallon TCE} / 2000$

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$$((1650 \text{ gallons TCE} - [0.5 \times 1000 \text{ gallons TCE}]) \times 12.2 \text{ pounds/gallon TCE}) / 2000 = 7.0 \text{ tons/year}$$

**C. Source Emissions**

Same as the facility emissions

**D. Conclusion**

The allowable is set at 8 tons TCE/year.

Monthly allowable emissions = 8.0 tons TCE emissions per year / 12 months per year = 0.67 tons TCE/month

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

This PTI's BAT determination and allowable emission limit was patterned after PTI 08-04096(emission unit L010) which was approved as a Draft on 11/16/2000.

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Trichloroethylene	8