

2 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

### GENERAL PERMIT CONDITIONS

#### TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

#### NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

#### CONSTRUCTION OF NEW SOURCE(S)

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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

3 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

approval constitutes a violation of Ohio Administrative Code (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 prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### 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.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### 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.

4 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This 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.

5 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Areway, Inc.** located in **Cuyahoga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
L002	Trichloro-ethylene open top vapor degreaser	Condenser	3745-31-05 3745-21-09 (0)(3)  40 CFR 63 Subpart "T" (MACT)	HC (VOC):  1.36 lbs/HR 5.94 TYP

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
HC	5.94

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records

6 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

shall be made available to the Director, or any representative of the Director, for review during normal business hours.

#### **WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

#### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Cleveland Air Pollution Control, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

7 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. COVER AND SAFETY SWITCH REQUIREMENTS**

1. The open top vapor degreaser shall employ a cover and safety switches as described below:
  - a. a cover that can be opened and closed easily without disturbing the vapor zone;
  - b. a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm;
  - c. a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;
  - d. a vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high; and,
  - e. a water flow switch, water pressure switch, or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.

**B. FREEBOARD RATIO AND COVER REQUIREMENTS**

1. A freeboard with a freeboard ratio greater than or equal to 0.75 shall be maintained, and if the open top vapor degreaser opening is greater than 10 square feet, the cover must be powered or equipped with mechanical features whereby it can be readily closed when the degreaser is not in use.

**C. REFRIGERATED CHILLER REQUIREMENT**

1. The permittee shall operate and maintain a refrigerated chiller for the open top vapor degreaser.

8 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

**D. DESIGN REQUIREMENT**

1. An enclosed design (i.e., the cover or door opens only when the dry part is actually entering or exiting the open top vapor degreaser) shall be employed to control the VOC emissions;
2. An idling and downtime mode cover that may be readily opened or closed that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects;
3. The open top vapor degreaser 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 part;.
4. The vapor 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;
5. The vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent drops to the sump heater coils; and,
6. The vapor cleaning machine shall have a primary condenser.

**E. REQUIRED OPERATIONAL PRACTICES**

1. The open top vapor degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. keep the cover closed at all times except when processing work loads through the degreaser;
  - b. minimize solvent carry-out by:
    - i. racking parts so that solvent drains freely and is not trapped;

9 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

- ii. moving parts in and out of the degreaser at less than 11 feet per minute;
- iii. holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer;
- iv. tipping out any pools of solvent on the cleaned parts before removal from the vapor zone;
- v. allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer;
- c. clean only materials that are neither porous nor absorbent;
- d. occupy no more than one-half of the degreaser's open-top area with a workload; and,
- e. always spray within the vapor level;
- f. repair solvent leaks immediately, or shut down the degreaser;
- g. store waste solvent only in covered containers;
- h. operate the cleaner such that water cannot be visually detected in solvent exiting the water separator;
- i. use no ventilation fans near the degreaser opening;
- j. when the cover is open, do not expose the open top vapor degreaser to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip;
- k. if a lip exhaust is used on the open top vapor degreaser, do not use a ventilation rate that exceeds 65 cubic feet per minute per square foot of

10 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements; and,

1. provide a permanent, conspicuous label, summarizing the operating procedures.

**F. MONITORING & RECORDKEEPING**

1. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermocouple to measure the temperature at the center of the air blanket during the idling mode.

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

2. The permittee shall maintain records of the following information:
  - a. the types of solvents employed in the open top vapor degreaser; and,
  - b. all equipment maintenance.
3. The permittee shall maintain records in writing or electronic form of the lifetime of the 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 and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be submitted; and,
  - c. records of the halogenated HAP solvent content for the solvent used.

11 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

4. The permittee shall maintain records either in electronic or written form for a period of 5 years.
  - a. the results of control device monitoring required in part (a) of this section (monitoring and recordkeeping);
  - b. records of written or orders for replacement parts, a description of the repairs made and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels; and,
  - c. estimates of annual solvent consumption.

**G. REPORTING REQUIREMENTS**

1. The permittee shall submit to the Administrator an initial statement of compliance for the cleaning machine. This report shall be submitted to the Administrator no later than 150 days after the compliance date specified in 40 CFR 63.460 (d) or May 1, 1998. This statement shall include the following:
  - a. the name and address if the owner or operator;
  - b. the address (i.e., physical location) of the solvent cleaning machine; and,
  - c. a list of the control equipment required to be monitored, 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.
2. The permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the following:
  - a. assigned statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the

12 of 12 Pages

Facility Name: **Areway, Inc.**

Application Number: **13-3146**

Date: **Draft PTI (date will be entered upon final issuance)**

proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.462 (d)(10);" and,

- b. an estimate of solvent consumption for the cleaning machine during the reporting period.
3. The permittee shall submit an exceedance report to the Administration semiannually. The exceedance report shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the following:
    - a. information on the actions taken to comply with the standards. This information shall include records of 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 accepted levels;
    - b. if the exceedance has occurred, the reason for the exceedance and a description of the actions taken; and,
    - c. if no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.