

☒ Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install No. 03-13456

A. Source Description

DTR Industries, Inc. operates an anti-vibration rubber and automotive hose parts manufacturing facility in Bluffton, Ohio, Allen County. DTR Industries, Inc. is proposing to modify their parts washing operation. Two parts washers, emissions units L003 and L004, are being switched from vapor degreasers to batch cold cleaners. As part of the proposal, DTR Industries, Inc. is requesting federally enforceable restrictions on the two parts washers, which, in conjunction with other recently permitted sources in PTI #03-13411 and #03-13454, will result in a facility-wide potential to emit (PTE) of 246.44 tons per year for VOCs. The tons VOC per year facility-wide PTE fall below the 250 tons per year threshold for applicability to 40 CFR 52 - Prevention of Significant Deterioration.

B. Facility Emissions and Attainment Status

Allen County is designated as attainment for ozone. The total federally enforceable permit allowable emissions for PTI #03-13456 will be 4.25 tons of VOC per year. Potential VOC emissions from all other emissions units at the facility total 242.19 tons per year. The total facility PTE of 246.44 tons VOC per year qualifies DTR Industries, Inc. for minor source status as defined in 40 CFR 52.

C. Source Emissions

The allowable VOC emissions from the two parts washers combined is 4.25 tons per year, which is an increase of 1.60 tons per year from the original combined allowable of 2.65 tons per year in PTI #03-10256.

D. Conclusion

The permit restrictions contained in PTI #03-13456 will prevent emissions from this facility from reaching the level of 250 tons per year for any criteria pollutant. This facility will not be considered a major source for PSD permitting purposes.



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: DRAFT PERMIT TO INSTALL
ALLEN COUNTY
Application No: 03-13456**

CERTIFIED MAIL

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

DATE: 8/8/2000

DTR Industries Inc
Jonathan Zimmerman
320 Snider Rd
Bluffton, OH 458170000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

NWDO

Lima-Allen Reg Plan Com

IN



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-13456

Application Number: 03-13456

APS Premise Number: 0302000166

Permit Fee: **To be entered upon final issuance**

Name of Facility: DTR Industries Inc

Person to Contact: Jonathan Zimmerman

Address: 320 Snider Rd
Bluffton, OH 458170000

Location of proposed air contaminant source(s) [emissions unit(s)]:

**320 Snider Rd
Bluffton, Ohio**

Description of proposed emissions unit(s):

modification of two metal parts washers to operate as batch cold cleaners and increase allowable OC emissions.

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

DTR Industries Inc

PTI Application: 03-13456

Issued: To be entered upon final issuance

Facility ID: 0302000166

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.

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 are inadequate 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 prove to be inadequate 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. 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.

10. 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.

11. 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	4.25

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>
Metal parts washer No. 1 (K3-1) (modification). Modification involves switching a vapor degreaser to a batch cold cleaner, and increasing the allowable OC emission limitation.	OAC rule 3745-31-05(A)(3)	408.3 lbs organic compounds (OC)/month, 2.45 tons OC/yr
	OAC rule 3745-31-05(D)	the requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T
	40 CFR Part 63, Subpart T	combined limit of 4.25 tons OC/rolling, 12-month period (see A.I.2.a)
	OAC rule 3745-21-09(O)(2)	control, design and work practice requirements (see A.I.2.b and A.I.2.c)
	OAC rule 3745-21-09(O)(5)	exempt (see A.I.2.d)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 4.25 tons OC/rolling, 12-month period for emissions units L003 and L004 combined, based on OC content and gallon usage restrictions. (see A.II.1. and A.II.2.)
- 2.b The permittee shall comply with the following batch cold cleaning machine standard in accordance with 40 CFR 63.462(a):
 - i. Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater.
- 2.c The permittee shall comply with the following work and operational practice requirements in accordance with 40 CFR 63.462(c):

- i. All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
 - ii. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - iii. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - iv. The permittee shall ensure that the solvent level does not exceed the fill line.
 - v. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of condition A.I.2.c.1. above.
 - vi. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
 - vii. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - viii. Sponges, fabric, wood, and paper products shall not be cleaned.
- 2.d** In accordance with OAC rule 3745-21-09(O)(6)(b), OAC rule 3745-21-09(O)(2) and OAC rule 3745-21-09(O)(5) shall not apply to this emissions unit, since the parts washer is subject to 40 CFR Part 63, Subpart T, and the requirements of this federal regulation are incorporated into this Permit to Install.
- 2.e** For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

II. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit which exceeds an OC content of 12.20 lbs/gal.
2. Emissions units L003 and L004 are existing emissions units and, as such, have an existing 12-month summation of the monthly usage rates in lieu of establishing monthly cumulative input rates for the first year of operation.

The maximum annual solvent usage rate for emissions unit L003 and L004 combined shall not exceed 697 gallons, based upon a rolling, 12-month summation of the monthly usage rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the non-combined allowable OC emission limitation of 408.3 lbs OC/month for emissions unit L003, and the combined allowable emission limitation of 4.25 tons OC per rolling, 12-month period for emissions units L003 and L004, the permittee shall collect and record the following information each month:

FOR EMISSIONS UNIT L003

- a. the name, type, and identification number of each solvent employed;
- b. the OC content of each solvent employed;
- c. the number of gallons of each solvent employed;
- d. the total OC emission rate from each solvent employed (b x c); and,
- e. the total OC emission rate from all solvents employed, (summation of d).

FOR COMBINED EMISSION RATES FROM BOTH EMISSIONS UNITS L003 AND L004

- f. the total combined OC emission rate from all solvents employed, in tons per month (summation of e);
- g. the rolling 12-month summation of the monthly OC emission rates; and,
- h. the rolling 12-month summation of the monthly total solvent usage.

Note: The permittee may also calculate solvent usage and OC emission rates in accordance with the following formulas if waste cleaning solvents are sent off-site for reclamation/disposal:

Solvent usage rate = (total gallons of cleaning solvent used x solvent density) - (total gallons of cleaning solvent sent off-site for disposal or reclamation)

OC emissions from solvent cleaning operations = (total gallons of cleaning solvent used x solvent density) - (total gallons of cleaning solvent sent off-site for disposal or reclamation [minus solids content of said material] x solvent density)

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. rolling, 12-month combined OC emission limitation.
 - b. lbs OC/month emission rate.

- c. OC content restriction.
- d. combined annual gallon usage restriction per rolling, 12-month period.

Deviation reports shall follow the requirements and reporting schedule in the General Terms and Conditions of this permit to install.

- 2. Emissions unit L003 is considered an existing solvent cleaning machine per 40 CFR 63.461, since the construction commenced before November 29, 1993. Therefore, the permittee shall comply with the following reporting requirements in accordance with 40 CFR 63.468(a) and 40 CFR 63.468(c):
 - a. In accordance with 40 CFR 63.468(a), the permittee shall submit an initial notification report to the Administrator of the U.S. EPA no later than August 29, 1995. This report shall include the following information:
 - i. The name and address of the permittee.
 - ii. The address (i.e., physical location) of the solvent cleaning machine.
 - iii. A brief description of each solvent cleaning machine type (batch cold), solvent/air interface area, and existing controls.
 - iv. The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
 - v. The anticipated compliance approach for each solvent cleaning machine.
 - vi. An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
 - b. In accordance with 40 CFR 63.468(c), the permittee shall submit a compliance report to the Administrator of the U.S. EPA no later than 150 days after December 2, 1997. This report shall include the following information:
 - i. The name and address of the permittee.
 - ii. The address (i.e., physical location) of the solvent cleaning machine.
 - iii. A statement, signed by the permittee of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this subpart.

- iv. The compliance approach for each solvent cleaning machine.
- 3. The permittee shall submit annual reports which specify the total combined OC emissions from emissions units L003 and L004 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I. of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation
408.3 lbs OC/month

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Section A.III.1. above.

- b. Emission Limitation
2.45 tons OC/yr

Applicable Compliance Method

The tons/yr limitation was developed by multiplying the 408.3 lbs OC/month limitation by the maximum operating schedule of 12 months/yr and dividing by 2,000. Therefore, provided that compliance with the monthly OC limitation is maintained, compliance with the annual OC limitation will be assumed.

- c. Emission Limitation
combined limit of 4.25 tons OC/rolling, 12-month period

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Section A.III.1. above.

- 2. The permittee shall comply with the following testing requirements in accordance with 40 CFR 63.465(e):

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

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

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

Where:

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

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

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

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

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

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

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

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

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

Where:

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

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Metal parts washer No. 1 (K3-1) (modification). Modification involves switching a vapor degreaser to a batch cold cleaner, and increasing the allowable OC emission limitation.	none	none

2. **Additional Terms and Conditions**

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Metal parts washer No. 2 (K3-2) (modification). Modification involves switching a vapor degreaser to a batch cold cleaner, and increasing the allowable OC emission limitation.	OAC rule 3745-31-05(A)(3)	408.3 lbs organic compounds (OC)/month, 2.45 tons OC/yr
	OAC rule 3745-31-05(D)	the requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T
	40 CFR Part 63, Subpart T	combined limit of 4.25 tons OC/rolling, 12-month period (see A.I.2.a)
	OAC rule 3745-21-09(O)(2)	control, design and work practice requirements (see A.I.2.b and A.I.2.c)
	OAC rule 3745-21-09(O)(5)	exempt (see A.I.2.d)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 4.25 tons OC/rolling, 12-month period for emissions units L003 and L004 combined, based on OC content and gallon usage restrictions. (see A.II.1. and A.II.2.)
- 2.b The permittee shall comply with the following batch cold cleaning machine standard in accordance with 40 CFR 63.462(a):
 - i. Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater.
- 2.c The permittee shall comply with the following work and operational practice requirements in accordance with 40 CFR 63.462(c):

- i. All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
 - ii. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - iii. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - iv. The permittee shall ensure that the solvent level does not exceed the fill line.
 - v. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of condition A.I.2.c.1. above.
 - vi. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
 - vii. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - viii. Sponges, fabric, wood, and paper products shall not be cleaned.
- 2.d** In accordance with OAC rule 3745-21-09(O)(6)(b), OAC rule 3745-21-09(O)(2) and OAC rule 3745-21-09(O)(5) shall not apply to this emissions unit, since the parts washer is subject to 40 CFR Part 63, Subpart T, and the requirements of this federal regulation are incorporated into this Permit to Install.
- 2.e** For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

II. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit which exceeds an OC content of 12.20 lbs/gal.
2. Emissions units L003 and L004 are existing emissions units and, as such, have an existing 12-month summation of the monthly usage rates in lieu of establishing monthly cumulative input rates for the first year of operation.

The maximum annual solvent usage rate for emissions unit L003 and L004 combined shall not exceed 697 gallons, based upon a rolling, 12-month summation of the monthly usage rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the non-combined allowable OC emission limitation of 408.3 lbs OC/month for emissions unit L004, and the combined allowable emission limitation of 4.25 tons OC per rolling, 12-month period for emissions units L003 and L004, the permittee shall collect and record the following information each month:

FOR EMISSIONS UNIT L004

- a. the name, type, and identification number of each solvent employed;
- b. the OC content of each solvent employed;
- c. the number of gallons of each solvent employed;
- d. the total OC emission rate from each solvent employed (b x c); and,
- e. the total OC emission rate from all solvents employed, (summation of d).

FOR COMBINED EMISSION RATES FROM BOTH EMISSIONS UNITS L003 AND L004

- f. the total combined OC emission rate from all solvents employed, in tons per month (summation of e);
- g. the rolling 12-month summation of the monthly OC emission rates; and,
- h. the rolling 12-month summation of the monthly total solvent usage.

Note: The permittee may also calculate solvent usage and OC emission rates in accordance with the following formulas if waste cleaning solvents are sent off-site for reclamation/disposal:

Solvent usage rate = (total gallons of cleaning solvent used x solvent density) - (total gallons of cleaning solvent sent off-site for disposal or reclamation)

OC emissions from solvent cleaning operations = (total gallons of cleaning solvent used x solvent density) - (total gallons of cleaning solvent sent off-site for disposal or reclamation [minus solids content of said material] x solvent density)

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. rolling, 12-month combined OC emission limitation.
 - b. lbs OC/month emission rate.

- c. OC content restriction.
- d. combined annual gallon usage restriction per rolling, 12-month period.

Deviation reports shall follow the requirements and reporting schedule in the General Terms and Conditions of this permit to install.

2. Emissions unit L004 is considered an existing solvent cleaning machine per 40 CFR 63.461, since the construction commenced before November 29, 1993. Therefore, the permittee shall comply with the following reporting requirements in accordance with 40 CFR 63.468(a) and 40 CFR 63.468(c):

a. In accordance with 40 CFR 63.468(a), the permittee shall submit an initial notification report to the Administrator of the U.S. EPA no later than August 29, 1995. This report shall include the following information:

- i. The name and address of the permittee.
- ii. The address (i.e., physical location) of the solvent cleaning machine.
- iii. A brief description of each solvent cleaning machine type (batch cold), solvent/air interface area, and existing controls.
- iv. The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
- v. The anticipated compliance approach for each solvent cleaning machine.
- vi. An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

b. In accordance with 40 CFR 63.468(c), the permittee shall submit a compliance report to the Administrator of the U.S. EPA no later than 150 days after December 2, 1997. This report shall include the following information:

- i. The name and address of the permittee.
- ii. The address (i.e., physical location) of the solvent cleaning machine.
- iii. A statement, signed by the permittee of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this subpart.
- iv. The compliance approach for each solvent cleaning machine.

3. The permittee shall submit annual reports which specify the total combined OC emissions from emissions units L003 and L004 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation
408.3 lbs OC/month

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Section A.III.1. above.

- b. Emission Limitation
2.45 tons OC/yr

Applicable Compliance Method

The tons/yr limitation was developed by multiplying the 408.3 lbs OC/month limitation by the maximum operating schedule of 12 months/yr and dividing by 2,000. Therefore, provided that compliance with the monthly OC limitation is maintained, compliance with the annual OC limitation will be assumed.

- c. Emission Limitation
combined limit of 4.25 tons OC/rolling, 12-month period

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Section A.III.1. above.

2. The permittee shall comply with the following testing requirements in accordance with 40 CFR 63.465(e):

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

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

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

Where:

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

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

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

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

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

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

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

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

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

Where:

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

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Metal parts washer No. 2 (K3-2) (modification). Modification involves switching a vapor degreaser to a batch cold cleaner, and increasing the allowable OC emission limitation.	none	none

2. **Additional Terms and Conditions**

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number:
03-13456

Facility ID: 0302000166

FACILITY NAME DTR Industries Inc

FACILITY DESCRIPTION modification of two metal parts washers to operate as batch cold cleaners and increase allowable OC emissions. CITY/TWP Bluffton

SIC CODE 3061 SCC CODE 4-01-003-06 EMISSIONS UNIT ID L003

EMISSIONS UNIT DESCRIPTION Metal parts washer No 1.

DATE INSTALLED April, 1988

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 ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.56 lb/hr	1.40	408.3 lbs/month	2.45
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? **40 CFR 63, Subpart T** _____ PSD? _____ OFFSET POLICY? _____

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

Compliance with 40 CFR 63, Subpart T, and compliance with the terms and conditions of this permit.

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 _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13456

Facility ID: 0302000166

FACILITY NAME DTR Industries Inc

FACILITY DESCRIPTION modification of two metal parts washers to operate as batch cold cleaners and increase allowable OC emissions. CITY/TWP Bluffton

SIC CODE 3061 SCC CODE 4-01-003-06 EMISSIONS UNIT ID L004EMISSIONS UNIT DESCRIPTION Metal parts washer No 2.DATE INSTALLED April, 1988

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 ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.56 lb/hr	1.12	408.3 lbs/month	2.45
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? **40 CFR 63,** _____ PSD? _____ OFFSET POLICY? _____
Subpart T

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

Compliance with 40 CFR 63, Subpart T, and compliance with the terms and conditions of this permit.

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 _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13456

Facility ID: 0302000166

FACILITY NAME DTR Industries Inc

FACILITY DESCRIPTION modification of two metal parts washers to operate as batch cold cleaners and increase allowable OC emissions. CITY/TWP Bluffton

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

<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>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0313456c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" 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):

NSR Discussion

See Calculations and Permit Review Forms

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 No. **03-13456**

A. Source Description

DTR Industries, Inc. operates an anti-vibration rubber and automotive hose parts manufacturing facility in Bluffton, Ohio, Allen County. DTR Industries, Inc. is proposing to modify their parts washing operation. Two parts washers, emissions units L003 and L004, are being switched from vapor degreasers to batch cold cleaners. As part of the proposal, DTR Industries, Inc. is requesting federally enforceable restrictions on the two parts washers, which, in conjunction with other recently permitted sources in PTI #03-13411 and #03-13454, will result in a facility-wide potential to emit (PTE) of 246.44 tons per year for VOCs. The tons VOC per year facility-wide PTE fall below the 250 tons per year threshold for applicability to 40 CFR 52 - Prevention of Significant Deterioration.

B. Facility Emissions and Attainment Status

Allen County is designated as attainment for ozone. The total federally enforceable permit allowable emissions for PTI #03-13456 will be 4.25 tons of VOC per year. Potential VOC emissions from all other emissions units at the facility total 242.19 tons per year. The total facility PTE of 246.44 tons VOC per year qualifies DTR Industries, Inc. for minor source status as defined in 40 CFR 52.

C. Source Emissions

C:\temp\permits3\5692.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 03-13456

Facility ID: 0302000166

FACILITY NAME DTR Industries Inc

FACILITY DESCRIPTION	modification of two metal parts washers to operate as batch cold cleaners and increase allowable OC emissions.	CITY/TWP	Bluffton
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The allowable VOC emissions from the two parts washers combined is 4.25 tons per year, which is an increase of 1.60 tons per year from the original combined allowable of 2.65 tons per year in PTI #03-10256.

D. Conclusion

The permit restrictions contained in PTI #03-13456 will prevent emissions from this facility from reaching the level of 250 tons per year for any criteria pollutant. This facility will not be considered a major source for PSD permitting purposes.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	4.25

NEW SOURCE REVIEW FORM B

PTI Number: 03-13456

Facility ID: 0302000166

FACILITY NAME DTR Industries Inc

FACILITY DESCRIPTION	modification of two metal parts washers to operate as batch cold cleaners and increase allowable OC emissions.	CITY/TWP	Bluffton
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