

Facility ID: 1318007651 Issuance type: Title V Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. The permittee shall comply with the applicable requirements of 40 CFR 63, Subpart DD (National Emission Standards for Hazardous Air Pollutants: Off-Site Waste and Recovery Operations), as specified in Attachment A of this permit.

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

P012 - drum auger system;
T003 - storage tank;
T004 - storage tank;
T005 - storage tank;
T006 - storage tank;
T007 - storage tank;
T008 - storage tank;
T009 - storage tank;
T010 - storage tank;
T011 - storage tank;
T012 - storage tank;
T013 - storage tank;
T014 - storage tank;
T015 - storage tank;
T016 - storage tank;
T017 - storage tank;
T018 - storage tank;
T019 - storage tank;
T020 - storage tank;
T021 - storage tank;
T022 - storage tank;
T023 - storage tank;
T024 - storage tank;
T025 - storage tank;
T026 - storage tank;
T027 - storage tank;
T028 - storage tank;
T029 - storage tank;
T030 - storage tank;
T031 - storage tank;
T032 - storage tank;
T033 - storage tank;
T034 - storage tank;
T035 - storage tank;
T036 - storage tank;
T037 - storage tank;
T038 - storage tank;
T039 - storage tank;
T040 - storage tank;
T041 - storage tank;
T042 - storage tank;
T043 - storage tank;
T044 - storage tank;
T045 - storage tank;
T046 - storage tank;
T047 - storage tank;
T048 - storage tank;

T049 - storage tank;
T050 - storage tank;
T051 - storage tank;
T052 - storage tank;
T053 - storage tank;
T054 - storage tank;
T055 - storage tank;
T056 - storage tank;
T057 - storage tank;
T058 - storage tank;
T059 - storage tank;
T060 - storage tank;
T061 - storage tank;
T062 - storage tank;
T063 - storage tank;
T064 - storage tank;
T065 - storage tank;
T066 - storage tank;
T067 - storage tank;
T068 - storage tank;
T069 - storage tank;
T070 - storage tank;
T071 - storage tank;
T072 - storage tank; and
T073 - storage tank.

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- [Go to Part III for Emissions Unit J002](#)
- [Go to Part III for Emissions Unit L001](#)
- [Go to Part III for Emissions Unit L002](#)
- [Go to Part III for Emissions Unit L003](#)
- [Go to Part III for Emissions Unit P001](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318007651 Emissions Unit ID: J001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
VOC solvent loading rack with vapor recovery system and drum filling stations	OAC 3745-31-05(A)(3) (PTI # 13-1454)	OC emissions shall not exceed 0.5 lb/day
	OAC rule 3745-21-07(E)	OC emissions shall not exceed 1.6 TPY See A.I.2.a below.

2. Additional Terms and Conditions

- a. The maximum daily throughput of all volatile photochemically reactive materials shall not exceed 40,000 gallons per day.

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II. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
2. The emissions of OC from this emissions unit shall not exceed 1.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and maintain the following information, on a daily basis, while emissions unit J001 is in operation:
 - a. the name and identification of each OC product;
 - b. the volume throughput of each OC product in gallons;
 - c. the density of each OC product, in pounds per gallon;
 - d. the molecular weight of each OC product;
 - e. the vapor pressure of each OC product in pounds per square inch absolute;
 - f. the total OC emission rate for all products, in pounds per day; and
 - g. the total OC emission rate for all products, in tons per rolling 12-months.

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IV. Reporting Requirements

1. Annual tank throughput reports shall be submitted by January 31 to the Cleveland Division of Air Quality (Cleveland DAQ).
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the Cleveland DAQ within 30 days of the occurrence of the deviation.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation and/or daily throughput restriction for OC. The quarterly reports shall be submitted in accordance with the General terms and conditions of this permit.

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V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission limitation:
0.5 pound OC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in section A.III of these terms and conditions and the following equation:

AP-42, section 5.2 (5/95), Loading losses = LL = (lbs/1000 gallons) = (12.46*S*P*M)/T
lbs/day = (LL)*gallons/day

Apply the above equation to each OC product and then sum total the emissions to obtain total lbs/day of OC emissions.

S= Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)
P= Vapor pressure of material loaded at T, in pounds per square inch absolute
M= Molecular weight of material loaded
T= Temperature of material loaded, degrees Rankine
 - b. Emission limitation:
1.6 tons OC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based on a rolling 12-month summation of OC emissions calculated as follows: sum total daily OC emissions as calculated from section A.V.1.a of these terms and conditions to obtain total lbs OC emissions/month, then sum total the total lbs OC emissions/month to obtain a rolling, 12-month summation, and divide the rolling, 12-month summation by 2000 lbs. Each new month constitutes a new 12-month summation.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1318007651 Emissions Unit ID: J001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318007651 Emissions Unit ID: J002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
VOC solvent loading rack with vapor recovery system and drum filling stations	OAC 3745-31-05(A)(3) (PTI # 13-1454)	OC emissions shall not exceed 0.5 lb/day OC emissions shall not exceed 1.6 TPY

OAC rule 3745-21-07(E)

See A.I.2.a below.

2. Additional Terms and Conditions

- a. The maximum daily throughput of all volatile photochemically reactive materials shall not exceed 40,000 gallons per day.

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II. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
2. The emissions of OC from this emissions unit shall not exceed 1.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and maintain the following information, on a daily basis, while emissions unit J001 is in operation:
 - a. the name and identification of each OC product;
 - b. the volume throughput of each OC product in gallons;
 - c. the density of each OC product, in pounds per gallon;
 - d. the molecular weight of each OC product;
 - e. the vapor pressure of each OC product in pounds per square inch absolute;
 - f. the total OC emission rate for all products, in pounds per day; and
 - g. the total OC emission rate for all products, in tons per rolling 12-months.

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IV. Reporting Requirements

1. Annual tank throughput reports shall be submitted by January 31 to the Cleveland Division of Air Quality (Cleveland DAQ).
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC. This written report shall be submitted to the Cleveland DAQ within 30 days of the occurrence of the deviation.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation and/or daily throughput restriction for OC. The quarterly reports shall be submitted in accordance with the General terms and conditions of this permit.

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V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission limitation:
0.5 pound OC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in section A.III of these terms and conditions and the following equation:

AP-42, section 5.2 (5/95), Loading losses = $LL = (\text{lbs}/1000 \text{ gallons}) = (12.46 * S * P * M) / T$
lbs/day = (LL)*gallons/day

Apply the above equation to each OC product and then sum total the emissions to obtain total lbs/day of OC emissions.

S= Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)
P= Vapor pressure of material loaded at T, in pounds per square inch absolute
M= Molecular weight of material loaded
T= Temperature of material loaded, degrees Rankine

- b. Emission limitation:
1.6 tons OC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based on a rolling 12-month summation of OC emissions calculated as follows: sum total daily OC emissions as calculated from section A.V.1.a of these terms and conditions to obtain total lbs OC emissions/month, then sum total the total lbs OC emissions/month to obtain a rolling, 12-month summation, and divide the rolling, 12-month summation by 2000 lbs. Each new month constitutes a new 12-month summation.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1318007651 Emissions Unit ID: J002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318007651 Emissions Unit ID: L001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
dip tank stripping operation with two dip tanks, each with a hood, using one blower and vented to one stack	OAC rule 3745-31-05(A)(3) (PTI # 13-03755)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 7.5 lbs/hr</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 19 TPY</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (O). See A.I.2.</p>

2. **Additional Terms and Conditions**

- a. The dip tanks shall be operated with covers, and if the solvent has a vapor pressure greater than 0.3 pounds per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
- b. The dip tanks shall be equipped with devices for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pounds per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during the draining, unless an internal type drainage device cannot fit into the cleaning system.
- c. The permittee shall install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at one hundred degrees Fahrenheit, or if the solvent is heated above one hundred twenty degrees Fahrenheit:
 - i. freeboard that gives a freeboard ratio greater than or equal to 0.7;
 - ii. water cover (solvent must be insoluble in and heavier than water); or
 - iii. other systems of equivalent control, such as refrigerated chiller or carbon adsorption.

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II. **Operational Restrictions**

1. The dip tanks shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the units:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.

- e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
- f. Clean only materials that are neither porous nor absorbent.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information:
 - a. the types of solvent employed in the cold cleaner; and
 - b. the vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.
- 2. The permittee shall maintain the following daily records for all solvents employed in this emission unit:
 - a. the company identification of each solvent employed;
 - b. the number of gallons of each solvent employed;
 - c. the number of gallons of solvent removed as waste;
 - d. the VOC content of each solvent employed, in pounds per gallon, as employed; and
 - e. the total VOC emissions for all solvents employed [summation of (b - c) x d for all solvents], in pounds.
- 3. The permittee shall maintain the following monthly records for all solvents employed in this emission unit:
 - a. the company identification of each solvent employed;
 - b. the number of gallons of each solvent employed;
 - c. the number of gallons of solvent removed as waste;
 - d. the VOC content of each solvent employed, in pounds per gallon, as employed;
 - e. the total VOC emissions for all solvents employed [summation of (b - c) x d for all solvents], in pounds;
 - f. the total number of hours the emission unit was operated; and
 - g. the average hourly emissions in lbs/hr (e / f).

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify any day the hourly VOC limit is exceeded.
- 2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
- 3. The permittee shall submit an annual report to the Cleveland DAQ that identifies the actual annual emission rate for the previous calendar year. The report shall be submitted by January 31 of each year,

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V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission limitation
 - 7.5 lbs/hr of VOC
 - Applicable Compliance Method
 - Compliance shall be determined based on record keeping requirements contained in Section III.
 - If required, the permittee shall determine compliance using Reference Method 25 or Method 25A, or determine the idling emission rate of the solvent cleaning machine using reference method 307 in 40 CFR 63, Appendix A.
 - b. Emission Limitation
 - 19 TPY of VOC
 - Applicable Compliance Method

Compliance with the above annual VOC limitation shall be determined by record keeping contained in Section III. The annual emission rate shall be determined by summing the daily (or monthly) OC emissions for each calendar year and divide the total by 2000 lb/ton.

To determine the annual volatile organic compound emission rate, the following equation shall be used:

$$E = [(L_s - L_w) D] / 2000$$

Where:

- E = Volatile organic compound emission rate in tons per year
- L_s = Liquid volume of cleaning solvent employed each year (gallons)
- L_w = Liquid volume of cleaning solvent removed as waste (gallons)
- D = Density of cleaning solvent (pounds/gallon)

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1318007651 Emissions Unit ID: L001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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dip tank stripping operation with two dip tanks, each with a hood, using one blower and vented to one stack.		
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit L001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following

summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Monoethanolamine (MEA)
 TLV (ug/m3): 1884.5
 Maximum Hourly Emission Rate (lbs/hr): 4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,236
 MAGLC (ug/m3): 44,863.2

- a. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - ii. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- b. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
- c. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - iii. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1318007651 Emissions Unit ID: L002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
wheel stripper operation with two 1700-gallon solvent tanks and one 500-gallon rinse tank using one blower, one condenser and one stack	OAC rule 3745-31-05(A)(3) (PTI # 13-03755)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 17 lbs/hr</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 50 TPY</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O). See A.I.2.a - A.I.2.c</p>
	OAC rule 3745-21-09(O)	

2. Additional Terms and Conditions

- a. The permittee shall comply with either (i) or (ii):
 - (a)
 - i. The wheel stripper shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pounds per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
 - OR
 - ii. The wheel stripper shall employ a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink - like work area which drains back to the reservoir, provided the sink-like area has an open drain area of less than 16 square inches and provided the solvent neither is heated above 120 degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit.
 - b. The wheel stripper shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pounds per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during the draining, unless an internal type drainage device cannot fit into the cleaning system.
 - c. The permittee shall install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at one hundred degrees Fahrenheit, or if the solvent is heated above one hundred twenty degrees Fahrenheit:
 - i. Freeboard that gives a freeboard ratio greater than or equal to 0.7;
 - ii. Water cover (solvent must be insoluble in and heavier than water); or
 - iii. Other systems of equivalent control, such as refrigerated chiller or carbon adsorption.

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II. Operational Restrictions

1. The wheel stripper shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
 - b. store waste solvent in covered containers;
 - c. close the cover whenever parts are not being handled in the cleaner;
 - d. drain the cleaned parts until dripping ceases;
 - e. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower type spray) at a pressure that does not exceed 10 pounds per square inch gauge; and
 - f. clean only materials that are neither porous nor absorbent.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:

- a. the types of solvent employed in the cold cleaner; and
 - b. the vapor pressure of each solvent, in pounds per square inch absolute, measured at 100 degrees Fahrenheit.
2. The permittee shall maintain the following daily records for all solvents employed in this emission unit:
 - a. the company identification of each solvent employed;
 - b. the number of gallons of each solvent employed;
 - c. the number of gallons of solvent removed as waste;
 - d. the VOC content of each solvent employed, in pounds per gallon, as employed; and
 - e. the total VOC emissions for all solvents employed [summation of (b - c) x d for all solvents], in pounds.
 3. The permittee shall maintain the following monthly records for all solvents employed in this emission unit:
 - a. the company identification of each solvent employed;
 - b. the number of gallons of each solvent employed;
 - c. the number of gallons of solvent removed as waste;
 - d. the VOC content of each solvent employed, in pounds per gallon, as employed;
 - e. the total VOC emissions for all solvents employed [summation of (b - c) x d for all solvents], in pounds;
 - f. the total number of hours the emission unit was operated; and
 - g. the average hourly emissions in lbs/hr (e / f).

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify any day the hourly VOC limit is exceeded.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. The permittee shall submit an annual report to the Cleveland DAQ that identifies the actual annual emission rate for the previous calendar year. The report shall be submitted by January 31 of the following year.

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V. Testing Requirements

1. Compliance with the emission limitations contained in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission limitation
17 lbs/hr of VOC

Applicable Compliance Method
Compliance shall be determined based on record keeping requirements contained in Section A.III.

If required, the permittee shall determine compliance using Reference Method 25 or 25A, or determine the idling emission rate of the solvent cleaning machine using reference method 307 in 40 CFR 63, Appendix A.
 - b. Emission Limitation
50 TPY of VOC

Applicable Compliance Method
Compliance with the above annual VOC limitation shall be determined by record keeping requirements contained in section A.III. The annual emissions shall be determined by summing the daily (or monthly) emissions for each calendar year and dividing the total by 2000 lbs/ton.

To determine the annual volatile organic compound emission rate, the following equation shall be used:

$$E = [(Ls - Lw) \times D] / 2000$$

Where:

E = Volatile organic compound emission rate in tons per year
Ls = Liquid volume of cleaning solvent employed each year (gallons)
Lw = Liquid volume of cleaning solvent removed as waste (gallons)
D = Density of cleaning solvent (pounds/gallon)

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1318007651 Emissions Unit ID: L002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
wheel stripper operation with two 1700-gallon solvent tanks and one 500-gallon rinse tank using one blower, one condenser and one stack		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit L002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Monoethanolamine (MEA)
 TLV (ug/m3): 1884.5
 Maximum Hourly Emission Rate (lbs/hr): 10
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,709
 MAGLC (ug/m3): 44,863.2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental

Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- ii. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 - b. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 - c. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - i. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - ii. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - iii. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1318007651 Emissions Unit ID: L003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
open top Ultra-Kool vapor degreaser with a cover (working mode) and freeboard refrigeration device as controls.	OAC rule 3745-31-05(A)(3) (PTI # 13-3776) 40 CFR, Subpart T	Emissions of trichloroethylene shall not exceed 3.73 lbs/hr and 16.3 TPY. The requirements established pursuant to this rule include compliance with the requirements of 40 CFR 63, subpart T. See section A.I.2

OAC rule 3745-21-09(O)

In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09 (O)(3) shall not apply to this emission unit.

2. Additional Terms and Conditions

- a. The open top vapor degreaser shall employ a cover and safety switches as described below:
 - (a)
 - i. A cover that can be opened and closed easily without disturbing the vapor zone.
 - ii. 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.
 - iii. A spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle.
 - iv. A vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high.
 - v. 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. The permittee shall operate and maintain a refrigerated chiller for the open top vapor degreaser (degreaser).
 - c. The permittee shall ensure that the chilled air blanket temperature (in F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
 - d. The permittee shall comply with the following requirements:
 - i. Ensure that the cover opens only for part entrance and removal and completely covers the degreaser opening when closed.
 - ii. Ensure that the working mode cover is maintained free of cracks, holes and other defects.
 - e. The permittee shall ensure that the degreaser conforms to the following design requirements:
 - i. The degreaser shall be designed or operated to meet the following control equipment or technique requirements:
 - a. Use of an idling and downtime mode cover that 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 requires the cover(s) to not be in place. The cover must be able to be readily opened or closed, must completely cover the cleaning machine openings when in place, and must be free of cracks, holes and other defects.
- OR
- ii. Use of reduced room draft that ensures that the flow or movement across the top of the freeboard area of the degreaser or within the degreaser enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
 - iii. The degreaser shall have a freeboard ratio of 1.0 or greater.
 - iv. The 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 parts.
 - v. The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - vi. The degreaser shall be equipped with a vapor level control device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - vi. The degreaser shall have a primary condenser.

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II. Operational Restrictions

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.
 - ii. Moving parts in and out of the degreaser at less than 11 parts 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 or absorbent.
 - d. Occupy no more than one-half of the degreaser's open-top area with a workload.
 - 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 dip tank lip.
 - k. If a lip exhaust is used on the top vapor degreaser, do not use a ventilation rate that exceeds 65 cubic feet per minute per square foot of degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration Requirements.
 - l. Provide a permanent, conspicuous label, summarizing the operating procedures.
2. The permittee shall meet all of the following required work and operational practices:
- a. Control air disturbances across the degreaser opening(s) by incorporating the following control equipment or techniques:
 - i. Cover(s) for the degreaser 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 requires the cover(s) to not be in place.
- OR
- ii. The permittee shall employ a reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the degreaser or within the degreaser enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
- b. The parts baskets or the parts being cleaned in degreaser shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.
 - c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the degreaser).
 - 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 degreaser unless an equally effective approach has been approved by the Cleveland Division of Air Quality (Cleveland DAQ).
 - e. Parts baskets or parts shall not be removed from the degreaser until dripping has stopped.
 - f. During startup of the degreaser, the primary condensers shall be turned on before the sump heater.
 - g. During shutdown of the degreaser, 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 degreaser, 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 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 (Cleveland DAQ) to achieve the same or better results as those recommended by the manufacturer.
 - j. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the (Cleveland DAQ).
 - 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.

I. Sponges, fabric, wood, and paper products shall not be cleaned.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information:
 - a. The types of solvents employed in the open top vapor degreaser.
 - b. All control equipment maintenance.
2. The permittee shall monitor the hoist speed as described below:
 - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - b. The permittee shall conducted monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured , the permittee may begin monitoring the hoist speed quarterly.
 - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
 - d. If the permittee can demonstrate to the satisfaction of the Cleveland DAQ in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
3. The permittee shall maintain the following records in written or electronic form for the lifetime of the degreaser:
 - 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 degreaser and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on November 29, 1993, or after November 29, 1993, may be substituted.
 - c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
4. The permittee shall maintain the following records in written or electronic form for a period of five years for the 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.
 - c. Estimates of annual trichloroethylene consumption for the degreaser.
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.
6. The permittee shall conduct monitoring and record the results on a monthly basis for the working-mode cover by conducting a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes and other defects.

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IV. **Reporting Requirements**

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. The report shall contain the tests of idling emissions meeting the specifications in Method 307 of 40 CFR Part 63, Appendix A. This report shall comply with the following requirements:
 - a. The test must be conducted on the same specific model degreaser used at the facility. The test can be done by the permittee of the affected machine or can be supplied by the vendor of that degreaser or a third party. If a degreaser vendor or a third party test report is used to demonstrate compliance, the following requirements shall be met:
 - i. The report shall include the following for the degreaser tested: name of person(s) or company that performed the test, model name, the date the solvent cleaning machine was tested, serial number, and a diagram of the solvent cleaning machine tested.
 - ii. The permittee shall comply with the following requirements:
 - (a) Submit a statement by the degreaser vendor that the unit tested is the same as the unit the report is being submitted for.
 - (b) Demonstrate to the satisfaction of the Cleveland DAQ that the TCE emissions from the degreaser

for which the test report is being submitted are equal to or less than the TCE emissions from the solvent cleaning machine in the vendor test report.

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

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V. **Testing Requirements**

1. 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 degreaser using the following equation:

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

Where:

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

H_i = hours of operation for degreaser 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 degreaser 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:

$$SAI = 2.2 \times (Vol)^{0.6}$$

Where:

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

Vol = the cleaning capacity of the degreaser (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.

2. Emission Limitation - 3.73 lbs/hr trichloroethylene

Applicable Compliance Method -

The hourly emission limit represents this emissions unit's Potential to Emit (PTE).

3. Emission Limitation - 16.3 TPY trichloroethylene

Applicable Compliance Method -

The annual emission limit represents this emissions unit's Potential to Emit (PTE).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1318007651 Emissions Unit ID: L003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318007651 Emissions Unit ID: P001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
thin film evaporator used to distill spent	OAC rule 3745-31-05 A)(3)	See A.I.2.a.

solvents under vacuum, equipped with a condenser (PTI # 13-1124)

OC emissions shall not exceed 3 lbs/hr.

OC emissions shall not exceed 3.1 TPY.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

OAC rule 3745-21-07(G)(2)

OC emissions shall not exceed 40 lbs/day

2. Additional Terms and Conditions

- a. The emission unit must always employ a double coiled water shell and tube condensers in series with a minimum total heat exchange surface area of 1,700 square feet and using a minimum of 500 gallons per minute of 55 degrees Fahrenheit (or less) cooling water.

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II. Operational Restrictions

1. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be more than 11 degrees Fahrenheit above the average temperature during the most recent emission test (August 29, 1997) that demonstrated the emissions unit was in compliance.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a daily basis for this emission unit.
- the company identification for each material processed;
 - the company identification of each recycled solvent;
 - the total operating hours for the emission unit, in hours per day;
 - the total amount of material processed in pounds per day;
 - the total summation of the OC emission rate for all materials employed, in pounds per day, calculated using the formula from Section A.V.1.a; and
 - the average hourly OC emission rate, in pounds per hour (e/c).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
3. The permittee shall collect and record the following information each day:
- The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission unit.
4. Weekly monitoring shall be done of all pumps seals, pipeline valves in liquid service and a process drains in accordance with the method outlined in OAC rule 3745-21-10(F).

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IV. Reporting Requirements

1. The permittee shall submit temperature quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily emission limitation for OC.
- The quarterly reports shall be submitted in accordance with the General terms and conditions of this permit.
3. The permittee shall notify the Cleveland Division of Air Quality in writing of any daily log showing that a leak occurred within the emission unit. The notification shall include a copy of such logs and shall be sent to Cleveland Division Of Air Quality within 30 days after the event occurs.
4. The permittee shall submit annual reports which include the following information:
- the type and quantities of materials processed;

- b. the type and quantities of recycled solvents and other materials;
- c. the number of vapor leaks found and repaired; and
- d. the actual annual OC emission rate.

These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
OC emissions shall not exceed 3 lbs/hr

Applicable Compliance Method
Compliance with the hourly emission limitation may be demonstrated based upon the record keeping requirements in Section A.III.I and the use of the following formulas:

$$M \text{ lbs/day} \times 0.5 \times 3 \text{ lbs OC/ton material} \times \text{ton}/2000 \text{ lbs} \times (1-0.95) = \text{lbs OC/day}$$

$$(\text{lbs OC/day}) / (\text{hrs of operation/day}) = \text{lbs OC/hr}$$
 Where:

 M = the amount, in pounds, of material processed per day;
 0.5 = 50% of solvent is recovered;
 3 lbs OC/ton = emission factor from the 1995 "Compilation of Air Pollutant Emission Factors" AP-42, Table 4.7-1 ; and
 0.95 = 95% control efficiency of the vapor recovery system
 - b. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - i. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the pound per hour mass emission limitation for organic compounds.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 18,25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (CDAQ).
 - b. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland Division of Air Quality. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit a notification for review and approval prior to the test(s) may result in the CDAQ refusal to accept the results of the emission test(s).

Personnel from the Cleveland Division of Air Quality shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality within 30 days following the completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CDAQ.
 - c. Emission Limitation:
OC emissions shall not exceed 40 lbs/day

Applicable Compliance Method
Compliance shall be demonstrated based upon the record keeping requirements in Section A.III.I
 - d. Emission Limitation:
OC emissions shall not exceed 3.1 tons per year

Applicable Compliance Method:
Compliance with the annual emission limitation of 3.1 tons per year shall be demonstrated by summing the daily OC emissions in section A. III.1.e of these terms and conditions and dividing by 2000 lbs/ton.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1318007651 Emissions Unit ID: P001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318007651 Emissions Unit ID: P009 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
dispersion/mixing of paint-type wastes	OAC rule 3745-31-05(A)(3) (PTI # 13-2720)	VOC emissions shall not exceed 7.3 tons per year. A condensation vapor recovery system must be employed at all times to achieve an emission control efficiency of 95%.
	OAC Rule 3745-21-07(G)(2)	See A.I.2.a

2. Additional Terms and Conditions

- a. The requirements of OAC rule 3745-21-07(G)(2) do not apply since the only operation occurring in this emissions unit is mixing without chemical reaction.

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II. Operational Restrictions

1. A vapor recovery system must be employed at all times the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a daily basis for this emission unit:
 - a. the company identification for each waste being mixed;
 - b. the company identification of any cleanup material employed and its physical state;
 - c. the number of gallons of all waste and each cleanup material employed;
 - d. the VOC content of all waste and cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all waste and cleanup materials, in pounds/day calculated as one minus the 95% control efficiency (0.05) multiplied by (c) x (d).
2. The permittee shall maintain daily records that document any time period when the vapor recovery system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the allowable emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
OC emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method:
Compliance with the annual emission limitation of 7.3 tons per year shall be demonstrated by summing the daily OC emissions, as determined from section A.III.1, for all coatings and cleanup materials for the calendar year.
- b. Emission Limitation:
95% control of OC emissions

Applicable Compliance Method
If required , compliance shall be determined using test Method 25 or 25A of 40 CFR 60, Appendix A.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1318007651 Emissions Unit ID: P009 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None