

Facility ID: 1318008053 Issuance type: Title V Preliminary Proposed Permit

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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. 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart T

The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Appendix C of 40 CFR Part 63, Subpart T: Parts 63.1(a)(1)-(3), 63.1(a)(4), 63.1(a)(6)-(8), 63.1(a)(10), 63.1(a)(12)-(14), 63.1(b)(2), 63.1(c)(1), 63.1(c)(2), 63.1(c)(4), 63.1(c)(5), 63.1(e), 63.2, 63.3(a)-(c), 63.4(a)(1)-(3), 63.4(a)(5), 63.4(b)-(c), 63.5(a)(1), 63.5(a)(2), 63.5(b)(1), 63.5(b)(4)-(6), 63.6(a), 63.6(b)(1)-(5), 63.6(c)(1)-(2), 63.6(c)(5), 63.6(e)(1)-(2), 63.6(f)-(g), 63.6(i)(1)-(14), 63.6(i)(16), 63.6(j), 63.7(a), 63.7(b), 63.7(c)(1), 63.7(e), 63.7(f), 63.7(g), 63.8(a)-(b), 63.8(f), 63.9(a)(1)-(4), 63.9(b)(1), 63.9(b)(2), 63.9(b)(3), 63.9(b)(5), 63.9(c), 63.9(d), 63.9(e), 63.9(i), 63.9(j), 63.10(a), 63.10(d)(1), 63.10(f), 63.11(a), 63.12(a)-(c), 63.13(a)-(c) and 63.15(a)-(b).

The following emissions unit is subject to the aforementioned requirements: L001.

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b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z002: compressor;
Z003: tapping units (10 units);
Z004: cooling tower;
Z005: parking lot (paved);
Z006: TCE storage tank;
Z007: Goff shot blast;
Z008: rust inhibitor dip tank; and,
Z009: spot welders.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1318008053 Emissions Unit ID: L001 Issuance type: Title V Preliminary 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>
Baron/Blakeslee DP12 perchloroethylene open top vapor degreaser	OAC rule 3745-31-05(A)(3) [PTI# 13-3206 (Issued 3/11/98)]	20.5 lbs/hr and 89.9 tons/yr (TPY) volatile organic compounds (VOCs)
		See Sections A.I.2.a through A.I.2.d below.
	40 CFR Part 63, Subpart T	The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T.
	OAC rule 3745-21-09(O)(6)(b)	See Sections A.I.2.a through A.I.2.d below. This emissions unit is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5). See Section A.I.2.e below.

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; and
 - v. a water flow switch, water pressure switch, or any other device which shuts off the sump heat if the water in the water-cooled condenser has no flow or no pressure, whichever is being monitored.

[Authority for term: PTI 13-3206, 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]
 - b. A freeboard with a freeboard ratio greater than or equal to 0.75 shall be maintained, and if the open top vapor degreaser opening is greater than 10 square feet, the cover must be powered or equipped with mechanical features whereby it can be readily closed when the degreaser is not in use.

[Authority for term: PTI 13-3206, 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]
 - c. The permittee shall operate and maintain a refrigerated chiller for the open top vapor degreaser.

[Authority for term: PTI 13-3206, 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]
 - d. The open top vapor degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - i. keep the cover closed at all times except when processing work loads through the degreaser;
 - ii. minimize solvent carry-out by:

- (a) racking parts so that solvent drains freely and is not trapped;
- (b) moving parts in and out of the degreaser at less than 11 feet per minute;
- (c) holding the parts in the vapor zone at least 30 seconds or until condensation ceases, whichever is longer;
- (d) tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and,
- (e) allowing parts to dry within the degreaser for at least 15 seconds or until visually dry, whichever is longer;
 - iii. clean only materials that are neither porous nor absorbent;
 - iv. occupy no more than one-half of the degreaser's open-top area with a workload;
 - v. always spray within the vapor level;
 - vi. repair solvent leaks immediately or shut down the degreaser;
 - vii. store waste solvent only in covered containers;
 - viii. operate the cleaner such that water cannot be visually detected in solvent exiting the water separator;
 - ix. use no ventilation fans near the degreaser opening;
 - x. when the cover is open, do not expose the open top vapor degreaser to drafts greater than 131 feet per minute, as measured between 3 and 6 feet upwind and at the same elevation as the tank lip;
 - xi. if a lip exhaust is used on the open top vapor degreaser, do not use a ventilation rate that exceeds 65 cubic feet per minute per square foot of degreaser open area, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements; and
 - xii. provide a permanent, conspicuous label summarizing the operating procedures.

[Authority for term: PTI 13-3206, 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

- e. The rule citation reflects the new exemption added to OAC rule 3745-21-09(O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR Part 63, Subpart T, provided the requirements of that Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The USEPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for VOC.

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II. Operational Restrictions

1. The permittee shall meet all of the following required work and operational practices:
 - a. the parts baskets or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less;
 - b. any spraying operations shall be done within the vapor zone or within the section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine);
 - c. parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Cleveland Division of Air Quality (CDAQ);
 - d. parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped;
 - e. during startup of a vapor cleaning machine, the primary condenser shall be turned on before the sump heater;
 - f. during shutdown of a vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
 - g. when solvent is added or drained from a solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
 - h. the solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturer of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of CDAQ to achieve the same or better results as those recommended by the manufacturer;
 - i. 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 a representative of CDAQ;

j. 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 would not allow liquid solvent to drain from the container; and

k. sponges, fabric, wood, and paper products shall not be cleaned.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(A)(1)]

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III. Monitoring and/or Record Keeping Requirements

1. 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. The temperature (in Fahrenheit), measured at the center of air blanket, shall be no greater than 30 percent of the solvent boiling point (30 percent of perchloroethylene's boiling point is 74.8 degrees Fahrenheit).

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

2. For the purpose of attaining a reduced room draft, the permittee shall conduct quarterly monitoring tests of the windspeed and monitor the room parameters (i.e., redirecting fans, closing doors and windows, etc.) on a weekly basis.

The permittee shall measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the following procedure:

- a. determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
- b. orient a velometer in the direction of the wind current at each of the 4 corners of the machine;
- c. record the reading for each corner; and
- d. average the values obtained at each corner and record the average wind speed.

The permittee shall monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

3. The permittee shall conduct a visual inspection and record the results on a monthly basis on the cover 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.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

4. 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 conduct 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; and
- c. if an exceedance of the hoist speed occurs during quarterly monitoring, the quarterly monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.

*During the compliance inspection dated 12/11/03, the permittee demonstrated to the satisfaction of CDAQ that the hoist speed is 8 feet per minute, which does not exceed the maximum speed of 11 feet per minute. Therefore, the required monitoring frequency is quarterly.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

5. The permittee shall maintain records in written or electronic form of the following information for the lifetime of the machine:

- a. the types of solvents employed in the open top vapor degreaser;
- b. all control equipment maintenance;
- c. the owner's manuals or written maintenance and operating procedures for the solvent cleaning machine and control equipment;
- d. the date of installation for the solvent cleaning machine and all its control devices; and
- e. records of the halogenated HAP solvent content for the solvent used.

[Authority for term: PTI 13-3206, 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

6. The permittee shall maintain records of the items below in electronic or written form for a period of 5 years for the solvent cleaning machine:

- a. the results of the monitoring required in Section A.III of this permit;
- b. information on the actions taken to comply with 40 CFR Parts 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels;
- c. monthly and annual perchloroethylene consumption for the solvent cleaning machine based on the equation below:
- i. (actual gallons used) - (gallons of waste recovered, if any); and
- d. actual monthly and annual hours of operation of the solvent cleaning machine.
- [Authority for term: PTI 13-3206, 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year and shall cover the reporting period of the previous calendar year. Each annual report shall contain the following:
- a. a signed statement from the facility owner or his designee stating that, "All operators of the solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in section 63.463(d)(10)"; and
- b. an estimate of solvent consumption during the reporting period.
- [Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]
2. The permittee shall submit an exceedance report on a semiannual basis and shall be post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
- a. the reason and description of the exceedance and action(s) taken to comply with 40 CFR Parts 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and
- b. if no exceedance has occurred, a statement to that effect shall be submitted.
- [Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]
3. If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters per minute and no correction was made within 15 days of detection; or if the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30 percent of the solvent's boiling point and no correction was made within 15 days of detection, the permittee shall submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from CDAQ.

The permittee may receive approval of less frequent reporting if the following conditions are met:

- a. the emissions unit has demonstrated a full year of compliance without an exceedance;
- b. the permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR Part 63.1, General Provisions; and
- c. CDAQ does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR Part 63.1, General Provisions.

[Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
20.5 lbs VOC per hour
- Applicable Compliance Method:
Compliance shall be based on the following calculation:
- $$(n \text{ gallons/month}) \times (13.47 \text{ lbs VOC/gal}) \times (1 \text{ month} / x \text{ hours}) = \text{lbs VOC/hr}$$
- where:
- n = (actual gallons of solvent used in this emissions unit per month) - (amount of waste recovered per month, if any)
- 13.47 lbs VOC/gal = maximum VOC content of solvent (perchloroethylene) used

x = actual number of hours this emissions unit operated per month

[Authority for term: PTI 13-3206 and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:
89.9 TPY VOC
- Applicable Compliance Method:
Compliance shall be determined using the following calculation:
- $$(n \text{ gallons/year}) \times (13.47 \text{ lbs VOC/gal}) \times (1 \text{ ton}/2000 \text{ lbs}) = \text{TPY VOC}$$
- where:
- n = (actual gallons of solvent used in this emissions unit per year) - (amount of waste recovered per year, if any)
- 13.47 lbs VOC/gal = maximum VOC content of solvent (perchloroethylene) used
- [Authority for term: PTI 13-3206 and OAC rule 3745-77-07(C)(1)]
2. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. The PTE shall be determined in accordance with the following procedures:
- a. Determine the potential to emit for each individual solvent cleaning using the following equations:
- $$\text{PTE}_i = H_i \times W_i \times \text{SAI}_i$$
- 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 calculate a solvent/air interface area using the procedure in paragraph (b) below.
- [Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]
- b. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the following equation:
- $$\text{SAI} = 2.2 * (\text{Vol})^{0.6}$$
- where:
- SAI = the solvent/air interface area (square meters)
- Vol = the cleaning capacity of the solvent cleaning machine (cubic meters)
- [Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]
- c. Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.
- [Authority for term: 40 CFR Part 63, Subpart T and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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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

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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

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