



State of Ohio Environmental Protection Agency

Summit County

RE: Final Permit to Install

Street
1800 \\
Column

address:
149
16-1049

Application No: **16-1874**

DATE: February 18, 1999

**Akron Selle Company
Otis Hower
225 West Bartges Street
Akron, OH 44331**

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

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

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

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

Very truly yours,

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

cc: USEPA
Akron Air Pollution Control



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Application Number: 16-1874

Per
Title

APS Premise 1677011090

Number:

Permit Fee: **\$200.00**

Name of Facility: Akron Selle Company

Person to Contact: Otis Hower

Address: 225 West Bartges Street

Akron, OH 44331

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

225 WEST BARGES STREET

AKRON, OHIO

Description of proposed emissions unit(s):

EXISTING IN-LINE HALOGENATED COLD DEGREASER.

Date of Issuance: February 18, 1999

Effective Date:

February 18, 1999

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of

Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	1.77

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Part II: Special Terms and Conditions**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or <u>Equipment</u>	Applicable <u>Rules/Requirements</u>	Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>
Existing Halogenated Degreaser	In-Line Cold OAC rule 3745-31-05 OAC rule 3745-21-09(O) 40 CFR 63 Subpart T	9.67 pounds per day organic compounds (OC) 1.77 tpy OC Equivalent to or less stringent than MACT. See A.2 below.

2. Additional Terms and Conditions

- a. The cold cleaner shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater.
- b. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5 (d) (1) of subpart A, with the following revisions and additions:
 - i. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
 - ii. The report shall include the anticipated compliance approach for the solvent cleaning machine.
 - iii. The report shall include an estimate of the trichlorethylene consumption for the

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solvent cleaning machine in lieu of the requirements of 40 CFR 63.5 (d) (1) (ii) (H), subpart A.

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B. Operational Restrictions

1. The permittee shall comply with the following work and operational practice requirements:
 - a. All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
 - b. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - c. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - d. The permittee shall ensure that the solvent level does not exceed the fill line.
 - e. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (1) (a) above.
 - f. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
 - g. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - h. Sponges, fabric, wood, and paper products shall not be cleaned.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the types of solvents employed in the cold cleaner;
 - b. the amounts of solvents employed, in gallons;

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- c. the amount of solvent shipped off site, in gallons minus solids;
- d. the OC content of the solvent, in pounds per gallon;
- e. the total emissions of organic compounds (i.e. (b - c)*d), in pounds;

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- f. the total number of days of operation; and,
- g. the average daily OC emission rate, in pounds per hour, (i.e. (e)/(f)).

D. Reporting Requirements

1. The permittee shall submit a compliance report no later than 150 days after December 2, 1997. This report shall include the following information:
 - a. The name and address of the permittee.
 - b. The address (i.e., physical location) of the solvent cleaning machine.
 - c. A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with 40 CFR part 63.
 - d. The compliance approach for the solvent cleaning machine.

2. The permittee shall submit deviation (excursion) reports which include an identification of each period during which the average daily total organic compound emissions exceeded 9.67 pounds per day, and the actual average daily organic compound emissions for each such period.

3. The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or Record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and Record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude

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deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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E. 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 solvent cleaning machine using the following equation:

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

Where:

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

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

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

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

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

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

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

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

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

Where:

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

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

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- c. Sum the PTEi for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

9.68 lbs/day OC
1.77 TPY OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of section C.1. of these T&Cs.

F. Miscellaneous Requirements

1. None.