State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
SUMMIT COUNTY
Application No: 16-02355

CERTIFIED MAIL

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

DATE: 6/24/2004

Thermo-Rite Manufacturing Co
Tom Coyne
1355 Evans Ave
Akron, OH 44309

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

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

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

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA ARAQMD Akron Met Area Trans Study WV PA

DRAFT PERMIT TO INSTALL 16-02355

Application Number:	16-02355
APS Premise Number:	1677010540
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Thermo-Rite Manufacturing Co
Person to Contact:	Tom Coyne
Address:	1355 Evans Ave Akron, OH 44309

Location of proposed air contaminant source(s) [emissions unit(s)]:
1355 Evans Ave
Akron, Ohio

Description of proposed emissions unit(s):
Modification to Increase Permit Limits, Replaces PTI 16-01877 issued final 8/1/00.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Record keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06**.** Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and 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 deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. 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.

5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	3.6

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
L002 - Detrex Model No. VS-800 Open-Top Vapor Degreaser - Batch Vapor Degreaser (the terms and conditions in this permit supercede the terms and conditions in PTI 16-01877 issued on 5/12/1999 and modified on 8/01/2000).	OAC rule 3745-31-05(A)(3)	0.3 ton of organic compounds (OC) per month and 3.6 tons of OC per year 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)	Paragraphs (O)(2) to (O)(5) of OAC rule 3745-21-09 shall not apply to any solvent metal cleaning operation which is subject to subpart T of 40 CFR Part 63, provided the requirements of that subpart T are specified in the terms and conditions of the permit to operate issued pursuant to rule 3745-35-02 of the Administrative Code, a permit to install issued pursuant to rule 3745-31-05 of the Administrative Code, or a title V permit issued pursuant to rule 3745-77-08 of the Administrative Code.
	40 CFR Part 63, Subpart T	The permittee shall ensure that the trichloroethylene monthly emissions from the solvent cleaning machine are equal to or less than 150 kilograms/square meter/month (30.7 pounds/square foot/month) as a 3-month, rolling average. [Authority for term: section 63.464(a)(1)(ii) of 40 CFR Part 63, subpart T]

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain a log of solvent additions and removals for the solvent cleaning machine.

[Authority for term: section 63.464(a)(1)(i) of 40 CFR Part 63, subpart T]

2. The permittee shall demonstrate compliance with the 3-month rolling average monthly emissions of less than or equal to 150 kilograms/square meter/month (30.7 pounds/square foot/month) on a monthly basis as follows:

a. The permittee shall, on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

b. The permittee shall on the first operating day of the month comply with the following:

i. Using the records of solvent additions and removals for the previous monthly reporting period, determine trichloroethylene emissions using the appropriate equation specified in the "Testing Requirements" section of this permit.

ii. Determine the total amount of trichloroethylene removed from the solvent cleaning machine in solid waste during the most recent monthly reporting period (kilograms or pounds of solvent per month) as specified in the "Testing Requirements" section of this permit.

iii. Determine the monthly rolling average for the 3-month period ending with the most recent reporting period using the appropriate equation specified in the "Testing Requirements" section of this permit.

[Authority for term: sections 63.465(b) & (c) of 40 CFR Part 63, subpart T]

3. The permittee shall maintain the following records either in electronic or written form for a period of five years:

a. The dates and amounts of trichloroethylene that are added to the solvent cleaning machine.

b. The trichloroethylene composition of wastes removed from the cleaning machines using the procedures described in the "Testing Requirements" section of this permit.

c. Calculation sheets showing how the monthly emissions and the rolling, 3-month average emissions of trichloroethylene from the solvent cleaning machine were determined, and the results of all calculations.

[Authority for term: section 63.467(c) of 40 CFR Part 63, subpart T]

4. The permittee shall maintain the following monthly records for this emissions unit:

a. The name and identification of each solvent employed;

b. The total number of gallons of each solvent added to the solvent cleaning machine;

c. The total monthly OC emission rate, in tons per month (i.e., [the sum (4.b) times (solvent density) for each solvent, then divided by 2000 pounds per ton].

IV. Reporting Requirements

1. The permittee shall submit an annual solvent emission report by February 1 of each year. The report shall cover the previous calendar year. The report shall contain the following:

a. The size (solvent/air interface area) and type of the solvent cleaning machine.

b. The average monthly trichloroethylene consumption for the solvent cleaning machine in kilograms or pounds per month.

c. The 3-month monthly rolling average trichloroethylene emissions estimates calculated each month using the method as described in the "Testing Requirements" section of this permit.

[Authority for term: section 63.468(g) of 40 CFR Part 63, subpart T]

2. The permittee shall submit an exceedance report on a semiannual basis. If the trichloroethylene 3-month, rolling average of 150 kilograms/square meter/month (30.7 pounds/square foot/month) is exceeded, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (appropriate District Office or local air agency). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR Part 63, subpart A and in 40 CFR Part 63, subpart T, and (3) the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in section 63.10(e)

(3) (iii) of 40 CFR Part 63, subpart A. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

a. The reason for the exceedance and a description of the action(s) taken to comply with the 3-month rolling average for trichloroethylene.

b. If no exceedance has occurred, a statement to that effect shall be submitted.

[Authority for term: section 63.468(h) of 40 CFR Part 63, subpart T]

3. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the OC emissions exceeded 0.3 ton per month, and the actual monthly OC emissions for each such month.

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. The permittee shall on the first operating day of every month:

a. Ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soil. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill line each month, immediately prior to calculating monthly emissions as specified in paragraph 1.b below. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

b. Comply with the following requirements:

i. Using the records of all solvent additions and removals for the three previous monthly reporting periods required in the "Monitoring and/or Record keeping Requirements" section of this permit, determine solvent emissions (Ei) using the equation below for cleaning machines with a solvent/air interface:

$$Ei = (SAi-LSRi-SSRi)/AREAi$$

Where:

Ei = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i (kilograms of solvent per square meter of solvent/air interface area per month or pounds of solvent per square foot of solvent/air interface area per month).

SAi = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i (kilograms or pounds of solvent per month).

LSRi = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period i (kilograms or pounds of solvent per month).

SSRi = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine in solid waste, obtained as described below in paragraph 1.b.ii below, during the most recent monthly reporting period i (kilograms or pounds of solvent per month).

AREAi = the solvent/air interface area of the solvent cleaning machine (square meters or square feet).

ii. Determine SSRi from tests conducted using reference method 25d or from engineering calculations included in the compliance report.

iii. Determine the monthly rolling average, EA, for the 3-month period ending with the most recent reporting period using the equation below for cleaning machines with a solvent/air interface.

EAi=(summation of Ei from j=1 to j=3)/3

Where:

EAi = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area per month or pounds of solvent per square foot of solvent/air interface area per month).

Ei = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area per month or pounds of solvent per square foot of solvent/air interface area per month).

j=1 = the most recent monthly reporting period.
j=2 = the monthly reporting period immediately prior to j=1.
j=3 = the monthly reporting period immediately prior to j=2.

[Authority for term: section 63.465(b) & (c) of 40 CFR Part 63, subpart T]

2. 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:

PTEi = Hi X Wi X SAIi

Where:

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

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

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

Wi=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.

SAIi=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 2.b below.

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

SAI = 2.2 * (Vol)^0.6

Where:

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

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

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

[Authority for term: section 63.465(e) of 40 CFR Part 63, subpart T]

3. 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 Limitations

0.3 ton of OC per month and 3.6 tons of OC per year

Applicable Compliance Method

Compliance with the emission limitations shall be determine through monthly record keeping of the solvent usage as require in section A.IV.4 of these terms and conditions.

Emission Limitation

The permittee shall ensure that the trichloroethylene monthly emissions from the solvent cleaning machine are equal to or less than 150 kilograms/square meter/month (30.7 pounds/square foot/month) as a 3-month, rolling average.

Applicable Compliance Method

Compliance with the emission limitation shall be determined based upon the procedures described in section A.V.1 of these terms and conditions.

VI. Miscellaneous Requirements

1. 40 CFR Part 63, subpart T can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce 40 CFR Part 63, subpart T. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of 40 CFR Part 63, subpart T is delegated to a State, local, or Tribal agency.

[Authority for term: section 63.470(a) of 40 CFR Part 63, subpart T]

2. In delegating implementation and enforcement authority of 40 CFR Part 63, subpart T to a State, local, or Tribal agency under 40 CFR Part 63, subpart E, the authorities contained in section A.VI.3 of these terms and conditions are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

[Authority for term: section 63.470(b) of 40 CFR Part 63, subpart T]

3. The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs 3.a through 3.d below.

a. Approval of alternatives to the requirements in sections 63.460, 63.462(a) through (d), and 63.463 through 63.464 (except for the authorities in section 63.463(d)(9)) of 40 CFR Part

63, subpart T. Use the procedures in section 63.469 of 40 CFR Part 63, subpart T to request the use of alternative equipment or procedures.

b. Approval of major alternatives to test methods under sections 63.7(e)(2)(ii) and (f) of 40 CFR Part 63, subpart A, as defined in section 63.90 of 40 CFR Part 63, subpart E, and as required in 40 CFR Part 63, subpart T.

c. Approval of major alternatives to monitoring under section 63.8(f) of 40 CFR Part 63, subpart A, as defined in section 63.90 of 40 CFR Part 63, subpart E, and as required in 40 CFR Part 63, subpart T.

d. Approval of major alternatives to record keeping and reporting under section 63.10(f), as defined in section 63.90 of 40 CFR Part 63, subpart E, and as required in 40 CFR Part 63, subpart T.

[Authority for term: section 63.470(c) of 40 CFR Part 63, subpart T]

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
L002 - Detrex Model No. VS-800 Open-Top Vapor Degreaser - Batch Vapor Degreaser (the terms and conditions in this permit supercede the terms and conditions in PTI 16-01877 issued on 5/12/1999 and modified on 8/01/2000.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 16-02355 Facility ID: 1677010540

FACILITY NAME Thermo-Rite Manufacturing Co

FACILITY DESCRIPTION Modification to Increase Permit Limits, Replaces PTI 16-01877 issued final 8/1/00. CITY/TWP Akron

SIC CODE 3499 SCC CODE 4-01-002-05 EMISSIONS UNIT ID L002

EMISSIONS UNIT DESCRIPTION Detrex Model No. VS-800 Open-Top Vapor Degreaser - Batch Vapor Degreaser (the terms and conditions in this permit supercede the terms and conditions in PTI 16-01877 issued on 5/12/1999 and modified on 8/01/2000).

DATE INSTALLED December 1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds			0.87	0.3 ton/month	3.6
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? Subpart T PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with 40 CFR Part 63, subpart T.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____