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Facility Name: **Getters Corporation of America**

Application Number: **13-3402**

Date: **September 30, 1998**

**GENERAL PERMIT CONDITIONS**

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(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 source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code

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(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.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### 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.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### 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.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Getters Corporation of America** located in **Cuyahoga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source <u>Number</u>	Source Identification <u>Description</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
L004	Open top vapor degreaser with solvent/air interface area less than 13 square feet using non-HAP solvent.	The BAT determined for this source is compliance with terms and conditions of this permit and federal EPA MACT standard.	3745-31-05   3745-21-09 (0)  40 CFR 63 Subpart T	VOC = 1.52 pounds/hour  Equipped with powered cover or with mechanical features.  The open top vapor degreaser shall employ the control combination:  1. Freeboard refriger- ation device; and,  2. A freeboard

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				ratio of 1.0 or greater.

SUMMARY  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	6.66

**NESHAP REQUIREMENTS**

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

<u>Source Number</u>	<u>Source Description</u>	<u>NESHAP Regulation (Subpart)</u>
L004	Open top vapor degreaser	40 CFR 63 Subpart T

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

- a. date of commencement of construction ( no later than 30 days

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- after such date);
- b. anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
  - c. actual date of initial start-up (within 15 days after such date); and
  - d. date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P.O. Box 163669  
Columbus, OH 43216-3669

and **Cleveland Air Pollution Control**  
**1925 St. Clair Avenue**  
**Cleveland, OH 44114**

#### **RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

#### **REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Cleveland Air Pollution Control**  
**1925 St. Clair Avenue, Cleveland, OH 44114.**

#### **WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

**BAT FOR OPEN TOP VAPOR DEGREASERS**

In accordance with OAC Rule 3745-21-09(0)(3), each owner or operator of an open top vapor degreaser shall:

- a. equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- b. install the following safety switches:
  1. a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser is either not circulating or too warm;
  2. a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;
  3. a vapor level control thermostat or any other device

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which shuts off the sump heat when the vapor level rises too high; and

4. 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;
- c. install one of the following devices:
1. a freeboard with a freeboard ratio greater than or equal to 0.75 - 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;
  2. refrigerated chiller;
  3. enclosed design (cover or door opens only when the dry part is actually entering or exiting the open top vapor degreaser);
  4. carbon adsorption system, with ventilation greater than or equal to 50 cubic feet per minute per square foot of air/solvent interface (when cover is open), and exhausting less than 25 parts per million (ppm) of solvent averaged over one complete adsorption cycle; or
  5. a control system, demonstrated to have control efficiency equivalent to or greater than any of the above, and approved by the Director; and
- d. operate and maintain the open top vapor degreaser in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.

#### **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.

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**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

A. The Trek open top vapor degreaser covered by this Permit-to-Install uses MCA Plus (a non-HAP solvent) as a degreasing solvent. This degreaser is subject to compliance with OAC Rule 3745-31-05, OAC Rule 3745-21-09(O) and 40 CFR 63 Subpart T to control air contaminant emissions. Before any other degreasing fluid is used in this degreaser, the applicant must apply for a Permit to Modify.

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

1. The VOC emissions from this degreaser shall not exceed 1.52 pounds per hour.

2. The open top vapor cleaning machine shall employ the following control combination:

a. Freeboard refrigeration device

The permittee shall ensure that the chilled air blanket temperature (in Fahrenheit) measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point; and,

b. A freeboard ratio of 1.0 or greater.

3. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:

a. 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 not to be in place. The cover must be able to be readily opened or closed, completely cover the cleaning machine openings when in place, and be free of cracks, holes and other defects;

b. the solvent cleaning machine shall have a freeboard ratio of 1.0 or greater;

c. the solvent cleaning machine shall have an

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- 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;
- d. the solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;
  - e. the solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser; and,
  - f. the solvent cleaning machine shall have a primary condenser.
4. The open top vapor cleaning machine shall employ a cover and safety switches as described below:
- a. a cover that can be opened and closed easily without disturbing the vapor zone;
  - b. 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;
  - c. a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;
  - d. a vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high; and,
  - e. 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.

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5. The open top vapor degreaser with opening greater than 10 square feet shall be equipped with a powered cover or with mechanical features whereby it can be readily closed when the degreaser is not in use.

**C. Operational Restrictions**

1. The permittee shall meet all of the following required work and operational practices:
  - a. control air disturbances across the solvent cleaning machine opening(s) by covering the solvent cleaning machine during 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 not to be in place;
  - b. 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;
  - c. any spray 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 solvent cleaning machine);
  - 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 solvent cleaning machine unless an equally effective approach has been approved by the Director (Cleveland Air Pollution Control);
  - e. parts baskets and parts shall not be removed from the solvent cleaning machine until dripping has stopped;
  - f. during startup of the solvent cleaning machine, the primary condensers shall be turned on before the

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sump heater;

- g. during shutdown of the solvent cleaning machine, 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 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;
- i. the solvent cleaning machine 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 Director (Cleveland Air Pollution Control) 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 Director (Cleveland Air Pollution Control);
- 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 would not allow liquid solvent to drain from the container; and,
- l. sponges, fabric, wood, and paper products shall not be cleaned.

**D. Monitoring and/or Recordkeeping 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 idling mode.

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**E. Reporting Requirements**

1. 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:
  - a. 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;
  - b. the report shall include the anticipated compliance approach for the solvent cleaning machine; and,
  - c. the report shall include an estimate for the MCA Plus consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5(d)(1)(ii)(H), subpart A.
2. The permittee shall submit an initial statement of compliance no later than 150 days after startup. Each initial statement of compliance shall contain the following:
  - a. the name and address of the permittee;
  - b. the address (i.e. physical location) of the solvent cleaning machine;
  - c. a list of the control equipment used to achieve compliance; and,
  - d. a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date for each piece of control equipment required to be monitored.
3. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

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- a. a signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machine and their control devices sufficient to pass the test required pursuant to 40 CFR Part 60.463(d)(10)"; and,
  - b. an estimate of solvent consumption during the reporting period.
4. The permittee shall submit an exceedance report on a semiannual basis. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30° of the solvent's boiling point and no correction was made within 15 days of detection, 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 (Cleveland Air Pollution Control). The permittee may receive approval of less frequent reporting if following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (Cleveland Air Pollution Control) 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 63.1, General Provisions. Each exceedance report shall be delivered and post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
  - a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 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.

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**F. Testing Requirements and Compliance Method Determinations**

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 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:

$$PTE_i = H_i \times W_i \times S_{ai}$$

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.

$S_{AIi}$  = 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

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machines that do not have a solvent area interface calculate a solvent/air interface area using the procedure in paragraph (b) below.

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

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

where:

SAI<sub>i</sub> = the solvent/air interface area (square meters).

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

- c. sum the PTE<sub>i</sub> for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.