

Mr. Roy Richards  
Detrex Corporation  
2263 Distributors Drive  
Indianapolis, Indiana 46241

**Re: Construction Permit # CP 097-11791-00373**

Dear Mr. Richards:

Enclosed is a Construction Permit issued in approval of construction and operation of the Detrex Corporation parts cleaning system, located at 2263 Distributors Drive, Indianapolis, Indiana.

Please note that this approval has been issued with certain conditions, which are on the permit under "Construction Conditions" and "Operation Conditions". If the conditions are not acceptable, contact the Environmental Resources Management Division by letter or telephone within fifteen (15) days from the date of this letter. The Division will arrange a meeting to discuss the conditions in question. If no agreement is reached, the Indianapolis Air Pollution Control Board may be petitioned within fifteen (15) days of the date of the meeting. The Board, after public notice and hearing, may sustain, modify, or rescind the conditions. Note that additional conditions may be included in the Operating Permit issued for the above equipment.

Please keep this Permit (or a copy) on file at the facility available for inspection by Division personnel. Please sign a copy of this letter on the line below and return the copy. The signature acknowledges only that the Permit has been received. If any of the conditions are not acceptable please follow the procedures listed above.

If you have any questions, please contact Mr. Boris Gorlin at (317) 327-2234. Thank you for your time and cooperation in this matter.

Sincerely,

Mona A. Salem  
Chief Operating Officer  
Department of Public Works

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Signature (acknowledging receipt)

enclosure        - one return copy  
                      - Construction Permit

cc:        permits - Mark Caraher  
              compliance - Matt Mosier  
              IDEM (OAM)

BG

# ***NEW SOURCE CONSTRUCTION PERMIT***

## **OFFICE OF AIR MANAGEMENT and INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION**

**Detrex Corporation  
2263 Distributors Drive  
Indianapolis, IN 46241**

herein known as the Permittee, is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP 097-11791-00373	
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works	Issuance Date:

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Company Name: **Detrex Corporation**  
Location: Indiana  
Permit Reviewer: Boris Gorlin

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**Affidavit of Construction  
Malfunction / Excess Emissions Report  
Semiannual Compliance Monitoring Report**

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and City of Indianapolis Environmental Resources Management Division (ERMD), Air Quality Management. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary source, a hazardous waste container storage facility, specializing in the sale of various products, including cleaning fluids and related cleaning equipment, and the recovery recycling of spent solvents. These operations emissions are below significance levels and do not require a permit. The Permittee is proposing to construct and operate a contract parts cleaning system with a cross rod vapor degreaser.

Authorized Individual: Mr. Roy Richards, Facility Manager  
Source Address: 2263 Distributors Drive, Indianapolis, Indiana 46241  
Mailing Address: 2263 Distributors Drive, Indianapolis, Indiana 46241  
Phone Number: 317-241-9379  
SIC Code: 2869, 5051  
County Location: Marion  
County Status: Attainment for all criteria pollutants  
Source Status: Major Source, Section 112 of the Clean Air Act

### A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) cross rod batch vapor Degreaser (model 2DCR-550-1S-SPCC), Emission Unit #113, using superheated vapor, with air solvent interface 96 square feet, maximum capacity 7,000 pounds per hour, Stack ID S/V-1. Emissions will be controlled by a freeboard refrigeration device and Carbon Adsorber, Emission Unit #115; Stack ID S/V-3.
- (b) Solvent Still, Emission Unit #114, (model S-400-S), Stack ID SV-1.
- (c) TTO Tank with a carbon drum for water polishing prior to discharge of the water, Stack S/V-1.

The system will use Trichloroethylene (CAS number 79-01-6) as the cleaning solvent.  
Planned system installation date - 2<sup>nd</sup> quarter of 2000.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22)(C)AA) - a single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year.

## **SECTION B GENERAL CONSTRUCTION CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5 Modification to Permit [326 IAC 2]**

Notwithstanding the Section B condition entitled "First Time Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 First Time Operating Permit [326 IAC 2-6.1]**

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the ERMD.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to ERMD.
  - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the ERMD prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the ERMD, the Permittee shall attach it to this document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
- (e) Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 326 IAC 2-5.1-4, the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

**B.7 Phase Construction Time Frame [326 IAC 2-1.1-9(5)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM and ERMD may revoke this permit to construct if the:

- (a) Construction of the parts cleaning system with a cross rod vapor degreaser has not begun within eighteen (18) months from the effective date of this permit or if during the construction work is suspended for a continuous period of one (1) year or more.

The IDEM and ERMD may extend such time upon satisfactory showing that an extension, formally requested by the Permittee, is justified.

**B.8 NSPS Reporting Requirement [40 CFR Part 63, Subpart T], [ 326 IAC 20-6-1]**

Pursuant to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR Part 63, Subpart T, the source owner/operator is hereby advised of the requirement to submit the initial notification report including the following information at the appropriate times:

- (a) brief description of each solvent cleaning machine including machine type, solvent/air interface are, and existing controls;
- (b) the anticipated compliance approach for each solvent cleaning machine;
- (c) an estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine;
- (d) commencement of construction date (no later than 30 days after such date);
- b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c) Actual start-up date (within 15 days after such date); and
- d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

and

**Environmental Resources Management Division  
Air Quality Management Section, Compliance Data Group  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2097,**

and to the following address:

Company Name: **Detrex Corporation**  
Location: Indiana  
Permit Reviewer: Boris Gorlin

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**United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590**

The application and enforcement of these standards have been delegated to the IDEM, OAM, and ERMD. The requirements of 40 CFR Part 63 are also federally enforceable.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

**C.1 Preventive Maintenance Plan [326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. IDEM, OAM, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**C.2 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

<b>Indiana Department of Environmental Management Compliance Data Section, Office of Air Management Group 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015</b>	<b>and</b>	<b>Environmental Resources Management Division Air Quality Management Section, Compliance Data 2700 South Belmont Avenue Indianapolis, Indiana 46221-2097,</b>
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Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM and ERMD within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, and ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, and ERMD within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, and ERMD shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**C.5 Permit Revocation [326 IAC 2-1-9]**

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Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM (**and local agency**), the fact that continuance of this permit is not consistent with purposes of this article.

**C.6 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary

Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity) monitor in a six (6) hour period.

**C.7 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**Testing Requirements**

**C.8 Performance Testing [326 IAC 3-6]**

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

<b>Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015</b>	<b>and</b>	<b>Environmental Resources Management Division Air Quality Management Section, Compliance Data Group 2700 South Belmont Avenue Indianapolis, Indiana 46221-2097,</b>
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no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM, and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and ERMD if the source submits to IDEM, OAM, and ERMD a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**Compliance Monitoring Requirements**

**C.9 Compliance Monitoring [326 IAC 2-1.1-11]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already

legally required shall be implemented when operation begins.

**C.10 Maintenance of Monitoring Equipment [IC 13-14-1-13]**

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.11 Monitoring Methods [326 IAC 3]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall

constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

### **Record Keeping and Reporting Requirements**

#### **C.13 Malfunctions Report [326 IAC 1-6-2]**

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and ERMD or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.14 Annual Emission Statement [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

<b>Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015</b>	<b>and</b>	<b>Environmental Resources Management Division Air Quality Management Section, Compliance Data Group 2700 South Belmont Avenue Indianapolis, Indiana 46221-2097,</b>
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- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]**

- (a) With the exception of performance tests conducted in accordance with Section C.8 (Performance Testing), all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit, shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the IDEM or ERMD within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

**C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit, the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

and

**Environmental Resources Management Division  
Air Quality Management Section, Compliance Data Group  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2097,**

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as described in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

**C.18 Open Burning**

That the Permittee shall not burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

**C.19 Emergency Reduction Plans [326 IAC 1-5-2]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

<b>Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015</b>	<b>and</b>	<b>Environmental Resources Management Division Air Quality Management Section, Compliance Data Group 2700 South Belmont Avenue Indianapolis, Indiana 46221-2097</b>
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within ninety (90) calendar days from the date on which this source commences operation.

- (c) If the ERP is disapproved by IDEM, OAM and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM, and ERMD shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (g) Upon direct notification by IDEM, OAM, and ERMD, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate level. [326 IAC 1-5-3]

## SECTION D

## EMISSIONS UNIT OPERATION CONDITIONS

One (1) cross rod batch vapor Degreaser (model 2DCR-550-1S-SPCC), Emission Unit #113, using superheated vapor, with air solvent interface 96 square feet, maximum capacity 7,000 pounds per hour, Stack ID S/V-1. Emissions will be controlled by a freeboard refrigeration device and Carbon Adsorber, Emission Unit #115.

### Emission Limitations and Standards

#### D.1 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T], [ 326 IAC 20-6-1]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1.

- (a) That pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
- (1) An idling and downtime mode cover, as described in 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the Degreaser openings when in place, and is free of cracks, holes, and other defects.
  - (2) The Degreaser shall have a freeboard ratio of 0.75 or greater.
  - (3) The Degreaser shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - (4) The Degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
  - (5) The Degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the Degreaser rises above the height of the primary condenser.
  - (6) The Degreaser shall have a primary condenser.
  - (7) The Degreaser shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of 40 CFR 63.463(e)(2)(vii).
  - (8) Cover to the Degreaser shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the Degreaser or maintenance or monitoring is being performed that requires the cover to not be in place.
  - (9) The parts baskets or the parts being cleaned in the Degreaser shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (b) That, pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operations are applicable:
- (1) Any spraying operations shall be done within the vapor zone or within a section of

- the Degreaser that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
- (4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from the Degreaser unless an equally effective approach has been approved by the ERMD.
  - (5) Parts baskets or parts shall not be removed from the Degreaser until dripping has stopped.
  - (6) During startup of the Degreaser, the primary condenser shall be turned on before the sump heater.
  - (7) During shutdown of the Degreaser, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
  - (8) When solvent is added or drained from the Degreaser, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
  - (9) The Degreaser and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the ERMD's satisfaction to achieve the same or better results as those recommended by the manufacturer.
  - (10) Each operator of the Degreaser shall receive training and will pass a solvent cleaning procedures test in accordance with 40 CFR 63.463(d)(10).
  - (11) 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.
  - (12) Sponges, fabric, wood, and paper products shall not be cleaned.
  - (13) Conduct monitoring of each control device used to comply with 63.463 of this subpart as provided in 63.466.
- (c) That, pursuant to 40 CFR 63.463(e)(2), the Permittee shall conform to the following control equipment requirements:
- (1) Determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified in paragraphs (e)(2)(i) through (e)(2)(vii) of this section.
  - (2) When using a reduced room draft the Permittee shall:
    - (i) ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at anytime as measured using the procedures in 40 CFR 63.466(d).
    - (ii) establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466 (d).

- (3) When using the freeboard refrigeration device, the owner or operator shall ensure that the chilled air blanket temperature (in F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
  - (4) When using the idling-mode cover, the owner or operator shall comply with the requirements specified in paragraphs (e)(2)(iv)(A) and (e)(2)(iv)(B) of this section.
  - (5) When using superheated vapor system, pursuant to 40 CFR 63.463(e)(2) (vi)(A), the owner or operator shall ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10°F above the solvent's boiling point.
  - (6) When using the carbon adsorber, pursuant to 40 CFR 63.463(e)(2) (vii)(A) through (C), the owner or operator shall:
    - (A) Ensure that the concentration of organic solvent in the exhaust from this device does not exceed 100 parts per million of any halogenated HAP compound as measured using the procedure in 63.466(e). If the halogenated HAP solvent concentration in the carbon adsorber exhaust exceeds 100 parts per million, the owner or operator shall adjust the desorption schedule or replace the disposable canister, if not a regenerative system, so that the exhaust concentration of halogenated HAP solvent is brought below 100 parts per million.
    - (B) Ensure that the carbon adsorber bed is not bypassed during desorption.
      - (i) Ensure that the lip exhaust is located above the solvent cleaning machine cover so that the cover closes below the lip exhaust level.
      - (ii) If any of the requirements of paragraph 40 CFR 63.463(e)(2) are not met, the owner or operator shall determine whether an exceedance has occurred using the criteria in paragraphs (e)(3)(i) and (e)(3)(ii) of this section.
- (d) That, pursuant to 40 CFR 63.465(e) and 40 CFR 63.466(a)-(g), the Permittee shall conform to the following Monitoring Requirements:
- (1) An owner or operator of the source shall determine their potential to emit from all solvent cleaning operations, using the procedures described in paragraphs (e)(1) through (e)(3). A facility's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the facility:

Determine the potential to emit for each individual solvent cleaning machine using equation:  
 **$PTE_i = H_i \times W_i \times SAI_i$** ,  
where,  
PTE<sub>i</sub> = the potential to emit for solvent cleaning machine i (kilograms of solvent per year).  
H<sub>i</sub> = hours of operation for solvent cleaning machine i (hours per year),  
H<sub>i</sub> = 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement.  
W<sub>i</sub> = the working mode uncontrolled emission rate (kilograms per square meter per

hour).  $W_i = 1.95$  kilograms per square meter per hour for batch vapor machines.  $SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 40 CFR 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface.

Sum the  $PTE_i$  for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

- (2) For a freeboard refrigeration device used to comply with these standards, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
- (3) For a cover (downtime-mode, and/or idling-mode cover) used to comply with these standards, the owner or operator shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects on a monthly basis.
- (4) The owner or operator shall determine the hoist (parts handler) 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). The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
- (5) If the owner or operator can demonstrate to the ERMD's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- (6) For the carbon adsorber used to comply with this subpart the owner or operator shall measure and record the concentration of halogenated HAP solvent in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedure specified in 40 CFR 63.466(e)(1)-(3):
  - (A) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of 25 parts per million by volume.
  - (B) Use the colorimetric detector tube according to the manufacturer's instructions.
  - (C) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.

- (7) Pursuant to 40 CFR 63.466(g), the owner or operator of this source can use alternative monitoring procedures approved by the ERMD.
- (e) That, pursuant to 40 CFR 63.463(e)(4), the owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 63.468(h).
- (f) That the owner or operator of this batch vapor solvent Degreaser complying with the provisions of 40 CFR 63.463 shall submit to the IDEM, OAM, and ERMD an initial compliance report. This report shall be submitted to the IDEM, OAM, and ERMD no later than 150 days after startup. Pursuant to 40 CFR 63.468(d1)-(d6), this statement shall include the following information:
- (1) The name and address of the owner or operator.
  - (2) The address (i.e., physical location) of the solvent cleaning machine(s).
  - (3) A list of the control equipment used to achieve compliance for each solvent cleaning machine.
  - (4) For each piece of control equipment required to be monitored, 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.
  - (5) The date and results of the weekly measurements of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 40 CFR 63.466(e).
- (g) The owner or operator of this batch vapor Degreaser, complying with the provisions of 40 CFR 63.463, shall submit an annual report by February 1 of the year following the one for which the reporting is being made. Pursuant to 40 CFR 63.468(f), this report shall include the following information:
- (1) A signed statement from the facility owner or his designee stating that, "All operators of 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 63.463(d)(10)."
  - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period. This estimate may be combined with the Annual Emission Statement.
- (h) Pursuant to 40 CFR 63.468(h), the owner or operator of this batch vapor Degreaser shall submit an exceedance report to the ERMD semiannually except when the ERMD determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (h)(1)-(3) of this section.

An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following

conditions of this section are met:

- (1) The source has demonstrated a full year of compliance without an exceedance.
- (2) The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63 subpart A (General Provisions) and in this subpart.
- (3) The ERMD does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of subpart A (General Provisions).

D.2 Open Top Vapor Degreaser Operation and Control [326 IAC 8-3-6(a) and (b)]

Pursuant to IAPCB Regulation 8-3-1 (2) (Organic solvent degreasing operations: applicability) and 326 IAC 8-3-6(a) and (b) (Open Top Vapor Degreaser Operation and Control Requirements),

- (a) the owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.
  - (2) Equip the degreaser with the following switches:
    - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
    - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than four (4) inches.
  - (3) Equip the degreaser with a permanent, conspicuous label which lists the opening requirements outlined in subsection (b).
  - (4) Equip the degreaser with the following control devices:
    - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
    - (B) A refrigerated chiller.
    - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
    - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
    - (E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) the owner or operator of an open top vapor degreaser shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when processing workloads through the degreaser.
  - (2) Minimize solvent carry out emissions by:
    - (A) Racking articles to allow complete drainage;
    - (B) Moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
    - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
    - (D) Tipping out any pools of solvent on the cleaned articles before removal; and
    - (E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
  - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
  - (4) Prohibit occupation of more than one-half ( $\frac{1}{2}$ ) of the degreaser's open top area with the workload.
  - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
  - (6) Prohibit solvent spraying above the vapor level.
  - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
  - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
  - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
  - (10) Prohibit the use of workplace fans near the degreaser opening.
  - (11) Prohibit visually detectable water in the solvent exiting the water separator.

D.3 Recordkeeping Requirements [40 CFR 63.467(a)(1)-(2), (b)(1)-(4)], [ 326 IAC 20-6-1]

That, pursuant to 40 CFR 63.467(a)(1)-(2) and 40 CFR 63.467(b)(1)-(4), the Permittee shall maintain, in written or electronic form, records of the following information specified below.

- (a) for the lifetime of the Degreaser:
  - (1) Owner's manuals, or if not available, written maintenance and operating procedures, for the Degreaser and control equipment.
  - (2) Records of the halogenated HAP solvent content for each solvent used in the Degreaser.
  - (3) The date of installation of the Degreaser and all of its control devices.
- (b) for a period of 5 years:
  - (1) Each owner or operator of the Degreaser, complying with 63.463, shall maintain records specified in paragraphs (b)(1) through (b)(4) of this section either in electronic or written form for a period of 5 years.
  - (2) The results of control device monitoring required under 63.466.
  - (3) Information on the actions taken to comply with 63.463(e) and (f). This information shall include 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.
  - (4) Estimates of annual solvent consumption.
  - (5) Records of the date and results of the weekly measurement of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 40 CFR 63.466(e).

**D.4 Reporting Requirements [326 IAC 2-1.1-11]**

A summary of the information to document compliance with Operation Condition C.9 shall be submitted to the IDEM, OAM, and ERMD addresses listed in Operation Condition C.17 of this permit.

- (a) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:
  - (i) Delivered by U.S. mail and postmarked on or before the date it is due; or
  - (ii) Delivered by any other method if it is received and stamped by IDEM, OAM and ERMD on or before the date it is due.
- (b) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (c) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (d) The first report shall cover the period commencing with the postmarked submission date of the Affidavit of Construction.

Company Name: Detrex Corporation  
Location: Indiana  
Permit Reviewer: Boris Gorlin

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Mail to: Air Quality Management Section  
Environmental Resources Management Division  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2097

Detrex Corporation  
2263 Distributors Drive,  
Indianapolis, IN 46241

### Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Detrex Corporation has constructed one (1) Parts Cleaning System, including one (1) cross rod batch vapor Degreaser (model 2DCR-550-1S-SPCC), Emission Unit #113, using superheated vapor, with air solvent interface 96 square feet, maximum capacity 7,000 pounds per hour; Solvent Still, Emission Unit #114, (model S-400-S), Stack ID SV-1; TTO Tank with a carbon drum for water polishing prior to discharge of the water, Stack S/V-1.  
Each unit is in conformity with the requirements and intent of the construction permit application received by the Environmental Resources Management Division on January 14, 2000, permitted pursuant to **Construction Permit No. CP-097-11791-0373, Plant ID No. 097-00373**, issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, year \_\_\_\_\_.

My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

Company Name: **Detrex Corporation**  
Location: Indiana  
Permit Reviewer: Boris Gorlin

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**City of Indianapolis**  
**Environmental Resources Management Division**  
**Compliance Data Group**  
2700 S. Belmont Ave.  
Indianapolis, Indiana 46221-2097  
Phone 317 / 327-2234, Fax: 317 / 327- 2274

## **Malfunction / Excess Emissions Report**

Company Name: **Detrex Corporation**

Location: **2263 Distributors Drive, Indianapolis, IN 46241**

Construction Permit No.: **CP 097-11791-0373**

**Parts Cleaning System.**  
**Cross Rod Batch Vapor Degreaser**

Control/Device Which Malfunctioned:
Affected Facility:
Date of Malfunction:
Start Time of Malfunction:
Duration Time of Out of Service:
Pollutant/s Emitted During Malfunction:
Estimate of Amount of Pollutant Emitted During the Malfunction (include how estimate was determined):
Measures Taken to Minimize Shutdown Time:
Reasons Why Facility Cannot be Shutdown During Repairs:
Interim Control Measures:
Measures Taken to Correct Malfunction:
Malfunction Reported By:
Title:
Signature:
Date: _____ Time: _____

The filing of such information is mandated by Federal, State, and Local Air Pollution Legislation. Violation of this mandate through omission or false information may be subject to penalty.

I hereby certify that the information contained in this notification is complete and accurate to the best of my knowledge.

Submitted by: \_\_\_\_\_ Title/Position: \_\_\_\_\_  
(Print)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Company Name: **Detrex Corporation**  
Location: Indiana  
Permit Reviewer: Boris Gorlin

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION  
DATA COMPLIANCE**

**CONSTRUCTION PERMIT  
SEMIANNUAL COMPLIANCE MONITORING REPORT**

Company Name: **Detrex Corporation**

Location: **2263 Distributors Drive, Indianapolis, IN 46241**

Construction Permit No.: **CP 097-11791-0373**

**Parts Cleaning System.  
Cross Rod Batch Vapor Degreaser**

**Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_**

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted **semiannually**. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)</b>	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indianapolis Environmental Resources Management Division  
Air Quality Management Section**

and

**Indiana Department of Environmental Management  
Office of Air Management**

Technical Support Document (TSD) for New Construction and Operation

**Source Background and Description**

Source Name:	<b>Detrex Corporation</b>
Source Location:	2263 Distributors Drive, Indianapolis, IN 46241
County:	Marion
Construction Permit No.:	097-11791-00373
SIC Code:	2869, 5051
Permit Reviewer:	B. Gorlin

The Environmental Resources Management Division (ERMD) has reviewed an application from Detrex Corporation relating to the construction and operation of one (1) parts cleaning system under a Standard Industrial Classification Codes (SIC) of 2869 (Industrial organic chemicals), 5051 (Metals service centers and offices), and consisting of the following equipment:

- (a) One (1) cross rod batch vapor Degreaser (model 2DCR-550-1S-SPCC), Emission Unit #113, using superheated vapor, with air solvent interface 96 square feet, maximum capacity 7,000 pounds per hour, Stack ID S/V-1. Emissions will be controlled by a freeboard refrigeration device and Carbon Adsorber, Emission Unit #115; Stack ID S/V-3.
- (b) Solvent Still, Emission Unit #114, (model S-400-S), Stack ID SV-1.
- (c) TTO Tank with a carbon drum for water polishing prior to discharge of the water, Stack S/V-1.

The system will use Trichloroethylene (CAS number 79-01-6) as the cleaning solvent.  
Planned system installation date - 2<sup>nd</sup> quarter of 2000.

This is the first permitting approval being issued to this source.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S/V-1	Cross rod batch vapor Degreaser, Solvent Still, TTO Tank with a carbon drum for water polishing	3	2	4,250	ambient
S/V-3	Carbon Adsorber	14	14	3,800	ambient

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 14, 2000.

### Emissions Calculations

See TSD Appendix A for detailed calculations on page 10.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential Emissions before control (tons/year)
Particulate Matter (PM)	0
Particulate Matter (PM10)	0
Sulfur Dioxide (SO <sub>2</sub> )	0
Volatile Organic Compounds (VOC)	167.94
Carbon Monoxide (CO)	0
Nitrogen Oxides (NO <sub>x</sub> )	0
Single Hazardous Air Pollutant (HAP)	167.94
Combination of HAPs	167.94

- (a) Potential emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are more than 10 tons per year. Therefore, pursuant to 326 IAC 2–5.1-3, a construction permit is required.

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM10, SO2, NOx and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0
PM10	0
SO <sub>2</sub>	0
VOC	167.94
CO	0
NO <sub>x</sub>	0
Single HAP	167.94
Combination HAPs	167.94

- (a) This new source is **not** a major stationary PSD source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) a single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year.

This new source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after

this source becomes subject to Title V.

### **Federal Rule Applicability**

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart T.

This halogenated solvent cleaning facility is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460, Subpart T).

- (a) That pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
- (1) An idling and downtime mode cover, as described in 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the Degreaser openings when in place, and is free of cracks, holes, and other defects.
  - (2) The Degreaser shall have a freeboard ratio of 0.75 or greater.
  - (3) The Degreaser shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - (4) The Degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
  - (5) The Degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the Degreaser rises above the height of the primary condenser.
  - (6) The Degreaser shall have a primary condenser.
  - (7) The Degreaser shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of 40 CFR 63.463(e)(2)(vii).
  - (8) Cover to the Degreaser shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the Degreaser or maintenance or monitoring is being performed that requires the cover to not be in place.
  - (9) The parts baskets or the parts being cleaned in the Degreaser shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (b) That, pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operations are applicable:
- (1) Any spraying operations shall be done within the vapor zone or within a section of the Degreaser that is not directly exposed to the ambient air (i.e., a baffled or

enclosed area of the solvent cleaning machine).

- (2) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from the Degreaser unless an equally effective approach has been approved by the ERMD.
  - (3) Parts baskets or parts shall not be removed from the Degreaser until dripping has stopped.
  - (4) During startup of the Degreaser, the primary condenser shall be turned on before the sump heater.
  - (5) During shutdown of the Degreaser, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
  - (6) When solvent is added or drained from the Degreaser, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
  - (7) The Degreaser and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the ERMD's satisfaction to achieve the same or better results as those recommended by the manufacturer.
  - (8) Each operator of the Degreaser shall receive training and will pass a solvent cleaning procedures test in accordance with 40 CFR 63.463(d)(10).
  - (9) 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.
  - (10) Sponges, fabric, wood, and paper products shall not be cleaned.
  - (11) Conduct monitoring of each control device used to comply with 63.463 of this subpart as provided in 63.466.
- (c) That, pursuant to 40 CFR 63.463(e)(2), the Permittee shall conform to the following control equipment requirements:
- (1) Determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified in paragraphs (e)(2)(i) through (e)(2)(vii) of this section.
  - (2) When using a reduced room draft the Permittee shall:
    - (i) ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at anytime as measured using the procedures in 40 CFR 63.466(d).

- (ii) establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466 (d).
- (3) When using the freeboard refrigeration device, the owner or operator shall ensure that the chilled air blanket temperature (in F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- (4) When using the idling-mode cover, the owner or operator shall comply with the requirements specified in paragraphs (e)(2)(iv)(A) and (e)(2)(iv)(B) of this section.
- (5) When using superheated vapor system, pursuant to 40 CFR 63.463(e)(2) (vi)(A), the owner or operator shall ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10°F above the solvent's boiling point.
- (6) When using the carbon adsorber, pursuant to 40 CFR 63.463(e)(2) (vii)(A) through (C), the owner or operator shall:
  - (A) Ensure that the concentration of organic solvent in the exhaust from this device does not exceed 100 parts per million of any halogenated HAP compound as measured using the procedure in 63.466(e). If the halogenated HAP solvent concentration in the carbon adsorber exhaust exceeds 100 parts per million, the owner or operator shall adjust the desorption schedule or replace the disposable canister, if not a regenerative system, so that the exhaust concentration of halogenated HAP solvent is brought below 100 parts per million.
  - (B) Ensure that the carbon adsorber bed is not bypassed during desorption.
    - (I) Ensure that the lip exhaust is located above the solvent cleaning machine cover so that the cover closes below the lip exhaust level.
    - (II) If any of the requirements of paragraph 40 CFR 63.463(e)(2) are not met, the owner or operator shall determine whether an exceedance has occurred using the criteria in paragraphs (e)(3)(i) and (e)(3)(ii) of this section.
- (d) That, pursuant to 40 CFR 63.465(e) and 40 CFR 63.466(a)-(g), the Permittee shall conform to the following Monitoring Requirements:
  - (1) An owner or operator of the source shall determine their potential to emit from all solvent cleaning operations, using the procedures described in paragraphs (e)(1) through (e)(3). A facility's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the facility:

Determine the potential to emit for each individual solvent cleaning machine using equation:

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

where,

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

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

$H_i = 8760$  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).  $W_i = 1.95$  kilograms per square meter per hour for batch vapor machines.

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 40 CFR 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface.

Sum the  $PTE_i$  for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

- (2) For a freeboard refrigeration device used to comply with these standards, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
- (3) For a cover (downtime-mode, and/or idling-mode cover) used to comply with these standards, the owner or operator shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects on a monthly basis.
- (4) The owner or operator shall determine the hoist (parts handler) 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). The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
- (5) If the owner or operator can demonstrate to the ERMD's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- (6) For the carbon adsorber used to comply with this subpart the owner or operator shall measure and record the concentration of halogenated HAP solvent in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedure specified in 40 CFR 63.466(e)(1)-(3):
  - (A) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of 25 parts per million by volume.

- (B) Use the colorimetric detector tube according to the manufacturer's instructions.
  - (C) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.
- (7) Pursuant to 40 CFR 63.466(g), the owner or operator of this source can use alternative monitoring procedures approved by the ERMD.
- (e) That, pursuant to 40 CFR 63.463(e)(4), the owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 63.468(h).
- (f) That the owner or operator of this batch vapor solvent Degreaser complying with the provisions of 40 CFR 63.463 shall submit to the IDEM, OAM, and ERMD an initial statement of compliance. This report shall be submitted to the IDEM, OAM, and ERMD no later than 150 days after startup. Pursuant to 40 CFR 63.468(d1)-(d6), this statement shall include the following information:
- (1) The name and address of the owner or operator.
  - (2) The address (i.e., physical location) of the solvent cleaning machine(s).
  - (3) A list of the control equipment used to achieve compliance for each solvent cleaning machine.
  - (4) For each piece of control equipment required to be monitored, 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.
  - (5) The date and results of the weekly measurements of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 40 CFR 63.466(e).
- (g) The owner or operator of this batch vapor Degreaser, complying with the provisions of 40 CFR 63.463, shall submit an annual report by February 1 of the year following the one for which the reporting is being made. Pursuant to 40 CFR 63.468(f), this report shall include the following information:
- (1) A signed statement from the facility owner or his designee stating that, "All operators of 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 63.463(d)(10)."
  - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period. This estimate may be combined with the Annual Emission Statement.

- (h) Pursuant to 40 CFR 63.468(h), the owner or operator of this batch vapor Degreaser shall submit an exceedance report to the ERMD semiannually except when the ERMD determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (h)(1)-(3) of this section.

An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions of this section are met:

- (1) The source has demonstrated a full year of compliance without an exceedance.
- (1) The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63 subpart A (General Provisions) and in this subpart.
- (2) The ERMD does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of subpart A (General Provisions).

### **State Rule Applicability**

#### 326 IAC 2-4.1-1(New Source Toxics Control)

Pursuant to 326 IAC 20-6-1 (Halogenated Solvent Cleaning), this source is subject to the requirements of the NESHAP 40 CFR 63 Subpart T (National Emission Standards for Halogenated Solvent Cleaning), including design, air control, operation and monitoring procedures, recordkeeping and reporting requirements.

Therefore, this source is not subject to the requirements of 326 IAC 2-4.1-1 (New source toxics control) as a major source specifically regulated by a standard issued pursuant to Section 112 (d) (Hazardous Air Pollutants. Emission Standards) of the CAA.

#### 326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 or July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

#### 326 IAC 8-3-6 (Open Top Vapor Degreaser Operations and Control Requirements)

326 IAC 8-3-6 (Open Top Vapor Degreaser Operations and Control Requirements) is applicable because the open top batch vapor degreaser has an air to solvent interface greater than 10.8 square feet (96 sq. ft).

### **Conclusion**

The construction of this new parts cleaning system will be subject to the conditions of the attached proposed **Construction Permit No. CP 097-11791-0373**.

**Appendix A Potential Emissions Calculation (VOC & HAP - Trichloroethylene) before control.**

Potential Emissions from the **cross rod batch vapor Degreaser** (model 2DCR-550-1S-SPCC), Emission Unit #113, using superheated vapor, with air to solvent interface **96 square feet**.

Pursuant to 40 CFR 63.465(e)(1), **PTE = H x W x SAI**,

where

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

H = hours of operation for solvent cleaning machine (hours per year), H=8760 hours per year.

W = the working mode uncontrolled emission rate (kilograms per square meter per hour). W= 1.95 kilograms per square meter per hour for batch vapor machines.

SAI = solvent/air interface area of solvent cleaning machine i (square meters). Section 40 CFR 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface.

SAI = 96 ft<sup>2</sup>=8.919 m<sup>2</sup>.

PTE = 8760 x 1.95 x 8.919 = 152,349 kg/yr or:

PTE = 152,349 x 2.20462lb/kg / 2,000 lb/ton = **167.94 ton/yr.**