



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

7/1/2013

STEVE KINGSLEY  
TECHMETALS, INC.  
PO BOX 1266  
DAYTON, OH 45401

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0857043032  
Permit Number: P0110879  
Permit Type: Renewal  
County: Montgomery

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: RAPCA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
TECHMETALS, INC.**

Facility ID:	0857043032
Permit Number:	P0110879
Permit Type:	Renewal
Issued:	7/1/2013
Effective:	7/1/2013
Expiration:	12/6/2021





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
TECHMETALS, INC.

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**Final Permit-to-Install and Operate**  
TECHMETALS, INC.  
**Permit Number:** P0110879  
**Facility ID:** 0857043032  
**Effective Date:** 7/1/2013

## Authorization

Facility ID: 0857043032  
Application Number(s): A0045460, A0045478, A0045479, A0045487  
Permit Number: P0110879  
Permit Description: Renewal PTIO for ten hard chromium electroplating process tanks. Nine with emissions elimination device (EED) control, and one with composite mesh pad and fume suppressant with a wetting agent control.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 7/1/2013  
Effective Date: 7/1/2013  
Expiration Date: 12/6/2021  
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

TECHMETALS, INC.  
345 SPRINGFIELD ST.  
Dayton, OH 45403

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

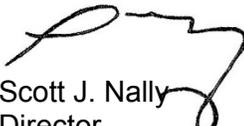
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110879

Permit Description: Renewal PTIO for ten hard chromium electroplating process tanks. Nine with emissions elimination device (EED) control, and one with composite mesh pad and fume suppressant with a wetting agent control.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-03193
General Permit Category and Type:	Not Applicable

**Group Name: chromium process tanks with EED**

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-03193
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-03193
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-03193
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-03193
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-03193
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P024</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-3912
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P025</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-3912
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P026</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-3973
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P027</b>
Company Equipment ID:	Hard Chrome Electroplating
Superseded Permit Number:	08-3973
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
TECHMETALS, INC.  
**Permit Number:** P0110879  
**Facility ID:** 0857043032  
**Effective Date:** 7/1/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
TECHMETALS, INC.  
**Permit Number:** P0110879  
**Facility ID:** 0857043032  
**Effective Date:** 7/1/2013

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. This facility is classified as a non-major (area) source and US EPA determined that areas sources subject to this rule are exempt from Title V permitting requirements.
3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Final Permit-to-Install and Operate**  
TECHMETALS, INC.  
**Permit Number:** P0110879  
**Facility ID:** 0857043032  
**Effective Date:** 7/1/2013

## **C. Emissions Unit Terms and Conditions**



**1. P004, Hard Chrome Electroplating**

**Operations, Property and/or Equipment Description:**

hard chromium electroplating process tank with composite mesh pad and fume suppressant with a wetting agent; 140-CR1 (installed prior to August 3, 2006)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The application of a composite mesh pad and a fume suppressant with a wetting agent to control chromium emissions. See b)(2)a.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart N.
b.	40 CFR Part 63, Subpart N, National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6 x 10E-06 grains per dry standard cubic foot (gr/dscf).  See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart A – National Emissions Standards for Hazardous Air Pollutants: General Provisions	Table 1 to Subpart N of 40 CFR Part 63 – General Provisions Applicability to Subpart N shows which parts of the General provisions in 40 CFR 63.1 through 15 apply.

(2) Additional Terms and Conditions

- a. The permittee has chosen to comply with this limitation with the application of a composite mesh pad (CMP) and a fume suppressant with a wetting agent as controls.
- b. This facility is classified as a large, hard chromium electroplating facility as defined in 40 CFR Part 63 Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The permittee shall comply with the requirements required under 40 CFR Part 63, Subpart N, including the following section:

63.342(b) – applicability of emissions limitations

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart N, including the following section:

63.342(f) – operation and maintenance practices

Table 1 to 63.342 – Summary of Operation and Maintenance Practices

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart N, including the following sections:

63.342(f) – operation and maintenance practices

63.343(c) – monitoring to demonstrate continuous compliance

63.346(a), (b) and (c) – record keeping requirements

Table 1 to 40 CFR Part 63, Subpart N – General Provisions Applicability to Subpart N

- (2) The permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating. To be in compliance, the composite mesh-pad system shall be operated with a pressure drop greater than 0 but less than 2.8 inches of water column, or such a range as may be established as the result of future performance testing. [The initial and most recent emissions test program



that demonstrated compliance was conducted on June 2, 1997, with an average pressure drop of 0.8 inch of water.]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart N, including the following sections:

63.342(f) – operation and maintenance practices

63.347(a) – reporting requirements

63.347(e) – notification of compliance status

63.347(h) – ongoing compliance status reports for area sources

Table 1 to 40 CFR Part 63, Subpart N - General Provisions Applicability to Subpart N

- (2) The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63, Subpart A. These reports shall be made to the Regional Air Pollution Control Agency and shall be sent by U.S. mail, fax, or by another courier, or may be submitted electronically through the Ohio EPA's "e-Business Center: Air Services".

- a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
- b. Submittals sent by other methods shall be received by the Regional Air Pollution Control Agency on or before the specified date.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6 x 10E-06 grains per dry standard cubic foot (gr/dscf).



**Final Permit-to-Install and Operate**  
TECHMETALS, INC.  
**Permit Number:** P0110879  
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**Effective Date:** 7/1/2013

Applicable Compliance Method:

A performance test was conducted on June 2, 1997 that demonstrated compliance. Compliance with the emissions limitation shall be based upon the record keeping specified in d)(2). If required, additional performance testing shall be conducted in accordance with the test methods and procedures specified in 40 CFR Part 63 Subpart N.

g) Miscellaneous Requirements

(1) None.



**2. Emissions Unit Group - chromium process tanks with EED: P001, P002,P003, P005, P006, P024, P025, P026, P027**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	hard chromium electroplating process tank with emission elimination device (EED); 110-CR1 (installed prior to August 3, 2006)
P002	hard chromium electroplating process tanks with emission elimination devices (EED); 120-CR1 and 120-CR2 (installed prior to August 3, 2006)
P003	hard chromium electroplating process tank with emission elimination device (EED); 120-CR3 (installed prior to August 3, 2006)
P005	hard chromium electroplating process tank with emission elimination device (EED); 150-CR1 (installed prior to August 3, 2006)
P006	hard chromium electroplating process tank with emission elimination device (EED); 150-CR2 (installed prior to August 3, 2006)
P024	hard chromium electroplating process tank with emission elimination device (EED); 170-CR-1 (installed prior to August 3, 2006)
P025	hard chromium electroplating process tank with emission elimination device (EED); 160-CR1 (installed prior to August 3, 2006)
P026	hard chromium electroplating process tank with emission elimination device (EED); 140-CR2 (installed prior to August 3, 2006)
P027	hard chromium electroplating process tank with emission elimination device (EED); 110-CR2 (installed prior to August 3, 2006)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None

b) Applicable Emissions Limitations and/or Control Requirements

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



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Application of an emission elimination device ("EED"), an alternative control technology.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart N.</p>
b.	40 CFR Part 63, Subpart N, National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	<p>The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6 x 10E-06 grains per dry standard cubic foot (gr/dscf).</p> <p>See b)(2)a. and b)(2)b.</p>
c.	40 CFR Part 63, Subpart A – National Emissions Standards for Hazardous Air Pollutants: General Provisions	Table 1 to Subpart N of 40 CFR Part 63 – General Provisions Applicability to Subpart N shows which parts of the General provisions in 40 CFR 63.1 through 15 apply.

(2) Additional Terms and Conditions

- a. This facility is classified as a large, hard chromium electroplating facility as defined in 40 CFR Part 63 Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The permittee shall comply with the requirements required under 40 CFR Part 63, Subpart N, including the following section:
  - 63.342(b) – applicability of emissions limitations
- b. The permittee shall employ the application of an emission elimination device ("EED") for controlling the total chromium emissions. The EED is an alternative control technology approved by USEPA. The permittee shall conduct a qualitative performance test of the EED using the test method as outlined and approved in the USEPA letter dated August 9, 1996, addressed to Techmetals, Incorporated.
- c. The permittee shall follow the work practice standards and continuous compliance monitoring program for the EED as outlined and approved in the USEPA letter dated September 4, 1996, addressed to Techmetals, Incorporated, resulting from a submittal required under sections 63.342(f)(3)(c) and 63.343(d) of 40 CFR Part 63, Subpart N for an air pollution control device not listed.



c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart N, including the following section:

63.342(f) – operation and maintenance practices

Table 1 to 63.342 – Summary of Operation and Maintenance Practices

At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated emission elimination devices (EEDs) and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

- (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.
- (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Regional Air Pollution Control Agency, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emission unit. Based on this information, the Regional Air Pollution Control Agency may require that the permittee make changes to the operation and maintenance plan if that plan:
- a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or,
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as possible.
- (4) The permittee shall follow the operation and maintenance plan revised 9/26/06 (or the most recent acceptable update of this plan). The plan shall include the following elements:
- a. the operation and maintenance criteria for the affected source, the EEDs, and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment;
  - b. work practice standards for the EEDs as outlined in the USEPA approval letter dated September 4, 1996, resulting from a submittal required under section 63.342 (f)(3)(c) and section 63.343 (d) of 40 CFR Part 63, Subpart N, for an air pollution control device not listed. These work practice standards shall include the following:



- i. drain the air-inlet (purge air) valves each time the seal of the EED is to be broken (at the end of plating run), prior to the seal of the EED being broken (this requirement is more stringent than the daily requirement as stated in the September 4, 1996, USEPA approval letter);
  - ii. perform weekly visual inspections of access door seals and membranes on the EED for integrity;
  - iii. drain the evacuation units, weekly, into the plating tank or into the rinse tanks (for recycle into the plating tank);
  - iv. perform monthly visual inspections of membranes for perforations using a light source that adequately illuminates the membrane (e.g., Grainger model No. 6X971 Fluorescent Hand Lamp);
  - v. perform monthly visual inspections of all clamps for proper operation and replace as needed;
  - vi. monthly cleaning or replacement of filters on the evacuation unit;
  - vii. perform quarterly inspections of the evacuation unit and the piping to and from the unit to ensure that there are no leaks and no evidence of chemical attack; and,
  - viii. replace access door seals, membranes evacuation unit filters, and purge air inlet check valves in accordance with manufacturer's recommendations.
- c. procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
  - d. a systematic procedure for identifying malfunctions of process equipment, EEDs, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions;
  - e. if the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs;
  - f. if actions taken by the permittee during periods of malfunctions are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after the commencing actions inconsistent with the plan (This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Regional Air Pollution Control Agency.);
  - g. the permittee shall keep the written operation and maintenance plan on record, and it shall be made available for inspection upon request by the Regional Air Pollution Control Agency for the life of the emissions unit (If the operation and



maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request by the Regional Air Pollution Control Agency, for a period of five years after each revision to the plan.); and,

- h. the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart N, including the following sections:

63.342(f) – operation and maintenance practices

63.343(c) – monitoring to demonstrate continuous compliance

63.346(a), (b) and (c) – record keeping requirements

Table 1 to 40 CFR Part 63, Subpart N - General Provisions Applicability to Subpart N

- (2) The permittee shall follow the continuous compliance monitoring program as outlined in the USEPA approval letter of September 4, 1996, including the following:

- a. the permittee shall monitor the continued integrity of the EED seals and membranes using the following methods (Compliance monitoring shall occur once each day that the affected source is operating using both of the following methods, unless no evacuation/purge cycle is performed. The absence of the evacuation/purge cycle shall be recorded and only the first method shall be used to determine compliance on that day.);

- i. verify the positive pressure on the EED membrane(s) when the electroplating tank is in operation and parts are being plated by inducing an external pressure to the membrane, which should be bulged slightly upward (This can be done by manually tapping the membrane downwards. By inducing external pressure on a segment of membrane, the balance of positive pressure is shifted to other part of the same membrane and/or to the other membrane(s). This should result in a movement at this and/or the other membrane(s) when the system is adequately sealed and the membrane(s) are intact. Absence of such movement or rebound of the membrane indicates lack of adequate seal or lack of membrane integrity.); and when applicable,

- ii. verify the presence of negative pressure on the EED membrane(s) during an evacuation/purge cycle (Negative pressure is demonstrated by movement of the membrane(s) toward the electroplating solution. The



absence of inward movement of the membrane(s) during evacuation indicates lack of adequate seal or lack of membrane integrity.);

- b. the permittee shall record the results of the daily EED integrity testing.

Operation of the emissions unit with the lack of adequate seals or membrane integrity shall constitute noncompliance with the standards.

- (3) The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A.
- (4) The permittee shall maintain the following records:
  - a. inspection records for the EEDs and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place (The record can take the form of a checklist and should identify the device inspected, the date of inspection, and any actions taken to correct deficiencies found during the inspection.);
  - b. records of all maintenance performed on the emissions unit, EEDs, and monitoring equipment;
  - c. records of the occurrence, duration, and cause (if known) of each malfunction of process, EEDs, and monitoring equipment;
  - d. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
  - e. other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan;
  - f. test reports documenting results of all performance tests;
  - g. all measurements as may be necessary to determine the conditions of performance tests;
  - h. records of monitoring data, including those required in 1.b above, that are used to demonstrate compliance with the standard including the data and time the data are collected;
  - i. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, EEDs, or monitoring equipment;
  - j. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, EEDs, or monitoring equipment;
  - k. the total process operating time of the emissions unit during the reporting period; and,



- I. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and sections 63.9 and 63.10 of 40 CFR Part 63, Subpart A.
- (5) All records of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.
- e) Reporting Requirements
- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart N, including the following sections:
    - 63.342(f) – operation and maintenance practices
    - 63.347(a) – reporting requirements
    - 63.347(e) – notification of compliance status
    - 63.347(h) – ongoing compliance status reports for area sources

Table 1 to 40 CFR Part 63, Subpart N - General Provisions Applicability to Subpart N
  - (2) The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63, Subpart A. These reports shall be made to the Regional Air Pollution Control Agency and shall be sent by U.S. mail, fax, or by another courier, or may be submitted electronically through the Ohio EPA's "e-Business Center: Air Services".
    - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
    - b. Submittals sent by other methods shall be received by the Regional Air Pollution Control Agency on or before the specified date.
  - (3) The permittee shall submit a Notification of Performance Test to the Regional Air Pollution Control Agency at least 60 Calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance test as scheduled, the provisions of 40 CFR Part 63, Subpart A, Section 63.7 (b)(2), shall apply.
  - (4) The permittee shall report to the Regional Air Pollution Control Agency the results of any performance test conducted. The report shall be submitted no later than 90 days following the completion of the performance test.
  - (5) The permittee shall prepare an ongoing compliance status report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Regional Air Pollution Control Agency to document the ongoing compliance status of the emissions unit. This report shall include the following:



- a. the company name and address of the emissions unit;
  - b. an identification of the operating parameter that is monitored for compliance determination;
  - c. the relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as determined by the most recent performance test;
  - d. a description of the type of process performed in the emissions unit;
  - e. the beginning and ending dates of the reporting period;
  - f. the total operating time of the emissions unit during the reporting period;
  - g. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and known causes;
  - h. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;
  - i. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;
  - j. a description of any changes in monitoring, processes, or controls since the last reporting period;
  - k. the name, title, and signature of the responsible official who is certifying accuracy of the report;
  - l. the date of the report; and
  - m. the report shall be completed annually and retained on site, and made available to the Regional Air Pollution Control Agency upon request.
- (6) The permittee shall submit semiannual reports if the following conditions are met:
- a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
  - b. the total duration of malfunctions of the air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.



- (7) Once the permittee reports an exceedance meeting the criterion in e)(6) above, ongoing compliance status reports shall be submitted semiannually.
- (8) The Regional Air Pollution Control Agency may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the emissions unit.
- (9) The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report on site once all of the following conditions are met:
  - a. for 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit;
  - b. the permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR Part 63, Subpart A and this permit; and,
  - c. the Regional Air Pollution Control Agency does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met:
    - i. the permittee notifies the Regional Air Pollution Control Agency in writing of its intentions to make such a change (The Regional Air Pollution Control Agency may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. If the permittee's request is disapproved, the Regional Air Pollution Control Agency will notify the permittee in writing within 45 days after receiving notice. In the absence of a notice of disapproval within 45 days, approval is automatically granted.); and,
    - ii. if monitoring data show that the emissions unit is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.
- (10) The permittee shall submit a notification of reconstruction as soon as practicable before the reconstruction has commenced to the Regional Air Pollution Control Agency which includes the following:



- a. the permittee's name, title, and address;
  - b. the address (i.e., physical location) or proposed address of the affected emissions units if different from the permittee's;
  - c. a notification of intention to make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CR Part 63.2;
  - d. an identification of 40 CFR Part 63, Subpart N as the basis for the notification;
  - e. the expected commencement and completion dates of the reconstruction;
  - f. the anticipated date of the reconstructed unit's initial startup;
  - g. the type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing);
  - h. a description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity; and,
  - i. an estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR Part 63, Subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.
- (11) The permittee shall notify the Regional Air Pollution Control Agency of any daily compliance test record which indicates the lack of adequate seals or membrane integrity. The notification shall include a copy of such record and shall be sent to the Regional Air Pollution Control Agency within 90 days after the test date.
- (12) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6 x 10E-06 grains per dry standard cubic foot (gr/dscf).



Applicable Compliance Method:

- i. Compliance shall be initially demonstrated through a qualitative performance test method as outlined and approved in USEPA's letter of August 9, 1996, addressed to Techmetals, Incorporated, and outlined as follows:
    - (a) A smoke generating device, capable of generating 500 to 1000 cubic feet of smoke per 20 square feet of tank surface area, shall be placed in a small container. The small container shall be placed on a stable and flat area at the center of the EED. Upon lighting the smoke device, the access door to the tank shall be quickly closed to avoid smoke from escaping. The smoke device shall be allowed to completely burn, filling the space under the EED. Once the area under the EED is filled with smoke, each seal, joint, and membrane of the EED shall be checked, from the outside, for signs of smoke leaking through.
    - (b) Any observed leaks in the EED shall be considered indications of noncompliance with the Chrome Plating NESHAP.
    - (c) When all seals, joints, and membranes have been observed, the evacuation unit shall be turned on to remove the smoke from the EED.
    - (d) After initial performance testing of the emissions unit has been completed, future performance testing of this type shall be completed at the request of the Regional Air Pollution Control Agency.
  - ii. Compliance shall be demonstrated on a daily basis, on each day the emissions unit is in use, through the procedures as described in d)(2). Should the daily demonstration indicate a lack of an adequate seal, or lack of membrane integrity, the emissions unit shall be considered to be operating in noncompliance with the standard.
- (2) Performance test results shall be documented in complete test reports that contain the following information:
- a. a brief process description;
  - b. sampling location description(s);
  - c. a description of sampling and analytical procedures and any modifications to standard procedures;
  - d. test results;
  - e. any other information required by the test method.



- (3) The permittee may use a performance test to demonstrate compliance if:
- a. the test methods and procedures identified in this permit were used during the performance test;
  - b. the performance test was conducted under representative operating conditions;
  - c. the performance test report contains the elements of f)(2).a. through f)(2)e.in this section; and,
  - d. the permittee has sufficient data to establish the operating parameter value that corresponds to compliance as required for continuous compliance monitoring.

g) Miscellaneous Requirements

- (1) None.