



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
MONTGOMERY COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 08-02339**

**DATE: 4/19/2001**

Delphi Chassis Systems - Needmore  
John Magary  
3100 Needmore Road-D-112C  
Dayton, OH 45401

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

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: USEPA

RAPCA

KY

IN

Miami Valley Reg Plan Com



**Permit To Install**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**DRAFT MODIFICATION OF PERMIT TO INSTALL 08-02339**

Application Number: 08-02339  
APS Premise Number: 0857040018  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Delphi Chassis Systems - Needmore  
Person to Contact: John Magary  
Address: 3100 Needmore Road-D-112C  
Dayton, OH 45401

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

**3100 Needmore Rd**  
**Dayton, Ohio**

Description of proposed emissions unit(s):

**udylite senior nickel-chrome plater (Administrative modification to PTI 08-02339 issued March 4, 1992 and modified March 3, 1993).**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**A. State and Federally Enforceable Permit To Install General Terms and Conditions****1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

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

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

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

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**10. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**11. Best Available Technology**

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

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

**1. Compliance Requirements**

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

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Permit Transfers**

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

**4. Air Pollution Nuisance**

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

**5. Termination of Permit To Install**

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

#### **6. Construction of New Sources(s)**

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

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

#### **7. Public Disclosure**

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

#### **8. Applicability**

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

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**9. Construction Compliance Certification**

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

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

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

**C. Permit To Install Summary of Allowable Emissions**

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

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

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
hexavalent chromium	0.0126
hydrochloric acid	1.42

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

None

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

None

Delphi  
PTI A

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

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P091 - udylyte senior nickel-chrome plater (modification)	<b>40 CFR Part 63 Subpart N</b>	<b>The concentration of total chromium in the exhaust gases discharged to the atmosphere shall not exceed 0.015 mg/dscm (6.6 E-06 gr/dscf).</b>
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulate emissions
	OAC rule 3745-31-05(A)(3)	0.003 lb/hour and 0.0126 TPY hexavalent chrome (Cr+6)
		1.0 lb/hour and 4.2 TPY hydrochloric acid (HCl)

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

1. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated air pollution control devices 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

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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 appropriate Ohio EPA District Office or local air 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 emissions unit. Based on this information, the appropriate Ohio EPA District Office or local air 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 practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
  - b. The O/M plan shall incorporate the following work practice standards:
    - i. Visually inspect the device at least once per quarter to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
    - ii. Visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
    - iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.
    - iv. Perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.

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- c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, 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 malfunction 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 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 appropriate Ohio EPA District Office or local air agency.
  - g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air 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 appropriate Ohio EPA District Office or local air agency for a period of five years after each revision to the plan.
  - 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.
5. The maximum annual operating hours for this emissions unit shall not exceed 8,400.

### III. Monitoring and/or Recordkeeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance:
  - a. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section

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of this permit. The initial performance testing was conducted on December 17, 1996 and December 4, 2000. The established pressure drop range was 4.8 to 7.5 inches of water.

- b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.
  - c. On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, 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 within the range of compliant values for pressure drop (4.8 - 7.5 inches of water) established during performance tests conducted on December 17, 1996 and December 4, 2000.
2. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A.
  3. The permittee also shall maintain the following records:
    - a. Inspection records for the add-on air pollution control device, if such a device is used, 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, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
    - b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.
    - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, 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 that are used to demonstrate compliance with the standard including the date 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, add-on air pollution control device, 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, add-on air pollution control device, or monitoring equipment.
- k. The total process operating time of the emissions unit during the reporting period.
- l. 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.

All records shall be maintained for a period of five years.

- 4. The permittee shall maintain monthly records of the operating hours for this emissions unit.

#### **IV. Reporting Requirements**

- 1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR part 63 subpart A. These reports shall be made to the appropriate Ohio EPA District Office or local air agency and shall be sent by U.S. mail, fax or by another courier.
  - 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 appropriate Ohio EPA District Office or local air agency on or before the specified date.
- 2. The permittee shall submit a Notification of Compliance Status to the appropriate Ohio EPA District Office or local air agency 90 days after the performance test is completed, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall list for each affected emissions unit:
  - a. The applicable emission limitations and the methods there were used to determine compliance with this limitation.
  - b. If a performance test is required, the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit, including measurements and calculations to support special compliance

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- provisions for multiple emissions units controlled by a common add-on air pollution control device.
- c. The type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm or mg/hr if the emissions unit is using the special provisions for multiple emissions units controlled by a common add-on air pollution control device. (For emissions units not required to conduct a performance test, the surface tension measurement may fulfill this requirement.)
  - d. For each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit.
  - e. The methods that will be used to determine continuous compliance.
  - f. A description of the air pollution control technique used for each emission point.
  - g. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards.
  - h. A statement by the owner or operator as to whether the emissions unit is in compliance.
3. The permittee shall prepare an ongoing compliance status report semiannually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the appropriate Ohio EPA District Office or local air 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 specified in the Notification of Compliance Status required by this section.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions

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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 unknown causes.

- g. 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.
  - h. 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.
  - i. A description of any changes in monitoring, processes, or controls since the last reporting period.
  - j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
  - k. The date of the report.
4. The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent basis) may reduce the frequency of reporting to semiannual if all of the following conditions are met:
- a. For 1 full year (e.g., 4 quarterly or 12 monthly 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 recordkeeping and monitoring requirements of 40 CFR Part 63 subpart A and others listed in this permit.
  - c. The appropriate Ohio EPA District Office or local air agency does not object to a reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies the appropriate Ohio EPA District Office or local air agency in writing of its intention to make such a change, and the appropriate Ohio EPA District Office or local air agency does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the appropriate Ohio EPA District Office or local air agency may review information concerning the facility's entire previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request

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is disapproved, the permittee will be notified in writing within 45 days after receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

- ii. As soon as the monitoring data show that the facility is not in compliance with the relevant emission limit, the frequency of reporting shall revert to quarterly, 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.
5. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation -  
0.015 mg/dscm (6.6 E-06 gr/dscf) total chromium in exhaust gases

Applicable Compliance Method -

Performance tests were conducted on December 17, 1996 and December 4, 2000 with results showing average chromium emission rates of 6.51 E-07 gr/dscf and 2.46 E-06 gr/dscf, respectively. If required, additional performance testing shall be conducted in accordance with the test methods and procedures specified in 40 CFR Part 63 Subpart N. Ongoing compliance shall be based upon the established operating parameters for the pressure drop across the composite mesh-pad emission control system.

- b. Emissions Limitation -  
0.551 lb/hour particulate matter

Applicable Compliance Method -

Compliance shall be determined by multiplying the AP-42 emission factor from Table 12.20 for hard chromium electroplating (0.25 gr/A-hr) by the maximum current of the plating bath (50,000 A) and the control efficiency of 90% (1 - 0.90). This grains per hour emission rate is then divided by 7,000 grains per pound to obtain the mass particulate emissions. If required, compliance with this mass emission limitation shall be based upon stack testing in accordance with OAC rule 3745-17-03(B)(10).

- c. Emissions Limitation -  
0.003 lb/hour Cr+6

Applicable Compliance Method -

Compliance with this allowable emission rate was demonstrated in performance tests conducted on December 17, 1996 and December 4, 2000 with results showing an average total chromium emission rate of 0.0000547 lb/hour and 0.000267 lb/hour, respectively. If required, additional performance testing shall be conducted in accordance with the methods and procedures specified in 40 CFR Part 63 Subpart N.

- d. Emissions Limitation -  
0.0126 TPY Cr+6

Applicable Compliance Method -

The 0.0126 ton/yr emissions limitation was developed by multiplying the 0.003 lb/hr by a maximum annual operating schedule of 8,400 hrs/yr. Therefore compliance shall be based upon the 12-month summation of the number of operating hours times the 0.003 lb/hr emissions limitation, divided by 2,000 lbs/ton.

- e. Emissions Limitation -  
1.0 lb/hr HCl

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Applicable Compliance Method -

Compliance with this allowable emission rate was demonstrated in a performance test conducted on October 14, 1993 with results showing a total HCl emission rate of 0.09 lb/hour. If required, additional performance testing shall be conducted in accordance with USEPA Reference Method 26, of 40 CFR Part 60, Appendix A.

- f. Emissions Limitation -  
4.2 TPY HCl

Applicable Compliance Method -

The 4.2 tons/yr emissions limitation was developed by multiplying the 1.0 lb/hr by a maximum annual operating schedule of 8,400 hrs/yr. Therefore compliance shall be based upon the 12-month summation of the number of operating hours times the 1.0 lb/hr emissions limitation, divided by 2,000 lbs/ton.

**VI. Miscellaneous Requirements**

1. This permit to install shall supercede all the air pollution control requirements for this emission unit contained in Permit to Install No. 08-02339, as issued on March 4, 1992 and administratively modified on March 18, 1994.

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**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P091 - udylite senior nickel-chrome plater (modification)	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-02339 Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

FACILITY DESCRIPTION udylite senior nickel-chrome plater CITY/TWP Dayton  
 (Administrative modification to PTI 08-02339 issued March 4, 1992 and modified March 3, 1993)

SIC CODE 3714 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION udylite senior nickel-chrome plater (modification)

DATE INSTALLED \_\_\_\_\_

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **40 CFR Part 63**

NESHAP?

PSD?

OFFSET POLICY?

**Subpart N**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? \_\_\_\_\_

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \_\_\_\_\_

\$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_

YES \_\_\_\_\_

NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-02339

Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

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FACILITY DESCRIPTION	udylite senior nickel-chrome plater (Administrative modification to PTI 08-02339 issued March 4, 1992 and modified March 3, 1993)	CITY/TWP	Dayton
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**NEW SOURCE REVIEW FORM B**

PTI Number: 08-02339 Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

FACILITY DESCRIPTION udylite senior nickel-chrome plater CITY/TWP Dayton  
(Administrative modification to PTI 08-02339 issued March 4, 1992 and modified March 3, 1993)

**ADMINISTRATIVE MODIFICATION**  
inter-office communication

to: DAPC, Air Quality Modeling and Planning  
from: Julie Mesloh, RAPCA  
subject: Administrative Modification of Permit To Install  
date: March 19, 2001

Choose one:

*Initiated by:*  Permitee  DO/laa

This modification is the result of an appeal to the Environmental Review Appeals Commission

*Please fill out the following:*

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

<u>Pollutant</u>	<u>Tons Per Year</u>
hexavalent chromium	0.0126
hydrochloric acid	1.42

Please provide a fairly detailed description of the basis for the modification and how the permit is being modified:  
This PTI is being modified to include the applicable requirements of 40 CFR Part 63 Subpart N. There are no changes in the allowable emission rates associated with this emissions unit.

*Additional comments:*

When this PTI was originally issued in March 1992, the requirements of 40

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-02339 Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

FACILITY DESCRIPTION	CITY/TWP
udylite senior nickel-chrome plater (Administrative modification to PTI 08-02339 issued March 4, 1992 and modified March 3, 1993)	Dayton

CFR Part 63 Subpart N had not been published in the Federal Register. Therefore, they were not included as part of PTI 08-2339. Recently, the facility conducted additional stack testing to establish a lower allowable pressure drop across the composite mesh pad system. In order to ensure that this lower pressure drop is recognized in the permit as well as include the requirements of 40 CFR Part 63 Subpart N, this PTI is being administratively modified. The terms written in this PTI are consistent with the terms in the Title V permit which was issued in final form on November 19, 1998, with the exception of the lower pressure drop operating range. The added terms have not been written in bold. The only thing changing in this permit is to add the requirements of 40 CFR Part 63 Subpart N. This is the majority of the permit and so all of the terms have not been written in bold. The terms for this emissions unit are based upon the STARS library section DD - Existing hard chrome electroplating tanks located at a small or large facility with composite mesh pad control, facility's maximum cumulative rectifier capacity is greater than or equal to 60 million amp-hr/year.