



10/31/2013

Certified Mail

Nicholas Holden  
Hohman Plating & Mfg. LCC  
814 Hillrose Ave.  
Dayton, OH 45409

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0857040217  
Permit Number: P0110235  
Permit Type: Renewal  
County: Montgomery

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/survey.aspx](http://www.epa.ohio.gov/survey.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  
Hohman Plating & Mfg. LCC**

Facility ID:	0857040217
Permit Number:	P0110235
Permit Type:	Renewal
Issued:	10/31/2013
Effective:	10/31/2013
Expiration:	9/1/2020





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Hohman Plating & Mfg. LCC

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**Final Permit-to-Install and Operate**  
Hohman Plating & Mfg. LCC  
**Permit Number:** P0110235  
**Facility ID:** 0857040217  
**Effective Date:** 10/31/2013

## Authorization

Facility ID: 0857040217  
Application Number(s): A0044767  
Permit Number: P0110235  
Permit Description: PTIO renewal for miscellaneous metal parts coating operations that include painting, chemical stripping and aluminum anodizing and a natural gas-fired sludge dryer.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 10/31/2013  
Effective Date: 10/31/2013  
Expiration Date: 9/1/2020  
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Hohman Plating & Mfg. LCC  
814 HILLROSE AVENUE  
DAYTON, OH 45404

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

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110235

Permit Description: PTIO renewal for miscellaneous metal parts coating operations that include painting, chemical stripping and aluminum anodizing and a natural gas-fired sludge dryer.

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>K001</b>
Company Equipment ID:	Paint spray booth
Superseded Permit Number:	08-03418
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P012</b>
Company Equipment ID:	Sludge dryer
Superseded Permit Number:	08-03328
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	Aluminum anodizing dept.
Superseded Permit Number:	08-03291
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P021</b>
Company Equipment ID:	Strip department
Superseded Permit Number:	08-02436
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P036</b>
Company Equipment ID:	Paint mixing and storage
Superseded Permit Number:	P0092662
General Permit Category and Type:	Not Applicable

**Group Name: Strip Systems w/wet scrubbers**

<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	Strip plating & pretreatment
Superseded Permit Number:	08-03320
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P022</b>
Company Equipment ID:	Strip & post treatment
Superseded Permit Number:	08-03320
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Hohman Plating & Mfg. LCC  
**Permit Number:** P0110235  
**Facility ID:** 0857040217  
**Effective Date:** 10/31/2013

## **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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 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 emission 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.



**Final Permit-to-Install and Operate**  
Hohman Plating & Mfg. LCC  
**Permit Number:** P0110235  
**Facility ID:** 0857040217  
**Effective Date:** 10/31/2013

**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**  
Hohman Plating & Mfg. LCC  
**Permit Number:** P0110235  
**Facility ID:** 0857040217  
**Effective Date:** 10/31/2013

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



**Final Permit-to-Install and Operate**

Hohman Plating & Mfg. LCC

**Permit Number:** P0110235

**Facility ID:** 0857040217

**Effective Date:** 10/31/2013

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 WWWW, National Emissions 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.



**Final Permit-to-Install and Operate**  
Hohman Plating & Mfg. LCC  
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**Effective Date:** 10/31/2013

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



**1. K001, Paint spray booth**

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

Two paint spray booths and two curing ovens

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) PTI 08-3418 issued March 15, 2001	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 45.0 pounds per day and 3.50 tons per year including cleanup materials.
b.	OAC rule 3745-21-09(U)(2)(e)	The permittee shall not employ more than eight gallons of coating per day for the miscellaneous metal parts and products coating line.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line.
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all of the coatings employed;
  - d. the VOC content of each coating, in pounds per gallon;
  - e. the identification of each cleanup material employed;
  - f. the volume, in gallons, of each cleanup material employed;
  - g. the VOC content of each cleanup material, in pounds per gallon;
  - h. the VOC emissions, in pounds, the sum of d)(1)b. multiplied by d)(1)d. for each coating plus d)(1)f. multiplied by d)(1)g. for each cleanup material.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:
  - a. Emissions Limitation –  
The VOC emissions from this emissions unit shall not exceed 45.0 pounds per hour, excluding cleanup materials.



Applicable Compliance Method –

Compliance will be based on the record keeping requirements of d)(1).

b. Emissions Limitation –

The VOC emissions from this emissions unit shall not exceed 3.50 tons per year including cleanup materials.

Applicable Compliance Method –

Compliance will be based on the record keeping requirements of d)(1) and the sum VOC emissions for each calendar year, in tons.

c. Emissions Limitation –

The permittee shall not employ more than eight gallons of coating per day for the miscellaneous metal parts and products coating line.

Applicable Compliance Method –

Compliance shall be based on the record keeping requirements of d)(1).

g) Miscellaneous Requirements

(1) None.



**2. P012, Sludge dryer**

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

400 pounds per hour natural gas fired sludge dryer with venturi scrubber

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) PTI 08-3328 issued July, 23, 2002	<p>The particulate emissions (PE) from this emissions unit shall not exceed 0.10 pound per hour (lb/hour) and 0.50 ton per year (TPY).</p> <p>The nitrogen oxide (NOx) emissions from this emissions unit shall not exceed 0.05 lb/hour and 0.22 TPY.</p> <p>The carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.04 lb/hour and 0.18 TPY.</p> <p>The organic compound (OC) emissions from this emissions unit shall not exceed 0.01 lb/hour and 0.05 TPY.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The visible emissions opacity from this emissions unit shall not exceed 5% opacity as a 6-minute average.
b.	40 CFR Part 61 Subpart E	The mercury emissions from this emissions unit shall not exceed 0.621 gram per 24-hour period.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The hourly and annual emissions limitations for NOx, and CO were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- b. The emissions from this emissions unit shall be vented to the venturi scrubber at all times the emissions unit is in operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the pressure drop across the scrubber, that shall be maintained in order to demonstrate compliance, shall be not less than 5 pounds per square inch (gauge).
- (2) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 2 gallons per minute.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufactures recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.



Whenever the monitored value for any parameter deviates from the range or minimum limits established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop and liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber or the liquid flow rate, were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in e)(2)a. or e)(2)b. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action, that would bring the pressure drop and liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in e)(2)a. or e)(2)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:
  - a. Emissions Limitation –  
The PE from this emissions unit shall not exceed 0.10 lb/hour.  
Applicable Compliance Method -  
Compliance with this emission limitation was demonstrated during a July 30, 1997 performance test with results showing emissions of 0.023 lb/hour particulate. If required, additional performance testing shall be conducted in accordance with OAC rule 3745-17-03(B)(10).



b. Emissions Limitation –

The PE from this emissions unit shall not exceed 0.50 TPY.

Applicable Compliance Method -

The 0.50 TPY limitation was developed by multiplying the 0.10 lb/hour limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emissions Limitation –

The NO<sub>x</sub> emissions from this emissions unit shall not exceed 0.05 lb/hour.

Applicable Compliance Method –

Compliance shall be determined by multiplying the maximum hourly gas burning capacity (0.00045 mmcf/hour) by the AP-42 Table 1.4-1 (7/98) emission factor for natural gas combustion of 100 lbsNO<sub>x</sub>/mmcf.

d. Emissions Limitation –

The NO<sub>x</sub> emissions from this emissions unit shall not exceed 0.22 TPY.

Applicable Compliance Method -

The 0.22 TPY limitation was developed by multiplying the 0.05 lb/hour limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. Emissions Limitation –

The CO emissions from this emissions unit shall not exceed 0.04 lb/hour.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly gas burning capacity (0.00045 mmcf/hour) by the AP-42 Table 1.4-1 (7/98) emission factor for natural gas combustion of 84 lbs CO/mmcf.

f. Emissions Limitation –

The CO emissions from this emissions unit shall not exceed 0.18 TPY.



Applicable Compliance Method -

The 0.18 TPY limitation was developed by multiplying the 0.04 lb/hour limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

g. Emissions Limitation –

The OC emissions from this emissions unit shall not exceed 0.01 lb/hour.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly gas burning capacity (0.00045 mmcf/hour) by the AP-42 Table 1.4-2 (7/98) emission factor for natural gas combustion of 11 lbs OC/mmcf.

h. Emissions Limitation –

The OC emissions from this emissions unit shall not exceed 0.05 TPY.

Applicable Compliance Method -

The 0.05 TPY limitation was developed by multiplying the 0.01 lb/hour limitation by the maximum operating schedule of 8760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

i. Emissions Limitation –

The opacity of the visible emissions from this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method -

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A..

j. Emissions Limitation –

The mercury emissions from this emissions unit shall not exceed 0.621 gram per 24-hour period.



Applicable Compliance Method -

In accordance with 40 CFR Part 61, and paragraph 61.54 of Subpart E, the permittee performed sludge sampling and analysis to determine mercury emissions as specified in USEPA Reference Method 105. The results demonstrated mercury emissions to be 0.302 gram per 24-hour period. If required, compliance shall be based on sludge sampling and analysis using the methods and procedures specified in USEPA Reference Method 105.

g) Miscellaneous Requirements

- (1) None.



**3. P014, Aluminum anodizing dept.**

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

Aluminum anodizing department (System No. 18) with packed bed scrubber and chromium anodizing system (tank No. 75) with fume suppressant

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) PTI 08-03291 issued July 18, 2002	The particulate emissions (PE) from this emissions unit shall not exceed 0.059 lb/hour and 0.26 TPY.  Visible emissions shall not exceed 5% opacity, as a six-minute average, except as provided by rule.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(B)(1) and 40 CFR Part 63, Subpart N.
b.	40 CFR 63.342(d) (40 CFR Part 63, Subpart N – National Emissions Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks)	See b)(2)a. through b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
C	40 CFR 63.1 through 15 (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.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Upon permit issuance through September 18, 2014, the permittee shall control chromium emissions discharged to the atmosphere by either not allowing the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.01 mg/dscm ( $4.4 \times 10^{-6}$  gr/dscf) or by not allowing the surface tension of the electroplating bath to exceed 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force per foot) as measured by a stalagmometer or 35 dynes per centimeter ( $2.4 \times 10^{-3}$  pound force per foot) as measured by a tensiometer at any time during operation of the tank. (40 CFR Part 63.342(d))
- b. Effective September 19, 2014, the permittee shall control chromium emissions discharged to the atmosphere by either not allowing the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.011 mg/dscm ( $4.8 \times 10^{-6}$  gr/dscf) or by not allowing the surface tension of the electroplating bath to exceed 40 dynes per centimeter ( $2.8 \times 10^{-3}$  pound-force per foot) as measured by a stalagmometer or 33 dynes per centimeter ( $2.3 \times 10^{-3}$  pound force per foot) as measured by a tensiometer at any time during operation of the tank. (40 CFR 63.342(d)(1), (3) and (4))
- c. After September 21, 2015, the permittee shall not add Perfluorooctane sulfonic acid (PFOS) based fume suppressants to any open surface hard chromium electroplating tank.
- d. 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 40CFR Part 63, Subpart N, including the following section:

63.342(f) – operation and maintenance practices.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the pressure drop across the scrubber, that shall be maintained in order to demonstrate compliance, shall be not less than 2 pounds per square inch (gauge).
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufactures recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range or minimum limits established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;



- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop and liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) 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)(5) – compliance demonstration for wetting-agent type or combination wetting agent-type foam blanket fume suppressants.

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

Table 1 to 40 CFR Part 63, Subpart N.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber exceeded the applicable limit contained in this permit;



- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in e)(2)a. or e)(2)b. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action, that would bring the pressure drop and liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in e)(2)a. or e)(2)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) 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), (c), (e), (g) and (h) – reporting requirements
- Table 1 to 40 CFR Part 63, Subpart N
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:
- a. Emissions Limitation –  
The PE from this emissions unit shall not exceed 0.059 lb/hour.  
Applicable Compliance Method –  
Compliance shall be determined by multiplying the AP-42 Table 12.20-2 (7/96) emission factor for chromic acid anodizing (0.0016 grains/hr-square foot of tank surface area) by the tank surface area (29.75 square feet). This grain per hour emission rate is then divided by 7000 grains per pound to determine 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).
  - b. Emissions Limitation –  
The PE from this emissions unit shall not exceed 0.26 TPY.



Applicable Compliance Method –

This emissions limitation was developed by multiplying the hourly emission rate of 0.059 lb/hour by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emissions Limitation –

Visible emissions shall not exceed 5% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method –

If required, Compliance shall be determined through visible emission evaluations performed using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A, and 40 CFR 60.675(c).

d. Emissions Limitation –

Upon permit issuance through September 18, 2014, the permittee shall control chromium emissions discharged to the atmosphere by either not allowing the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 mg/dscm ( $6.6 \times 10^{-6}$  gr/dscf) or by not allowing the surface tension of the electroplating bath to exceed 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force per foot) as measured by a stalagmometer or 35 dynes per centimeter ( $2.4 \times 10^{-3}$  pound force per foot) as measured by a tensiometer at any time during operation of the tank.

Effective September 19, 2014, the permittee shall control chromium emissions discharged to the atmosphere by either not allowing the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.011 mg/dscm ( $4.8 \times 10^{-6}$  gr/dscf) or by not allowing the surface tension of the electroplating bath to exceed 40 dynes per centimeter ( $2.8 \times 10^{-3}$  pound-force per foot) as measured by a stalagmometer or 33 dynes per centimeter ( $2.3 \times 10^{-3}$  pound force per foot) as measured by a tensiometer at any time during operation of the tank.

Applicable Compliance Method –

Ongoing compliance shall be based upon the established operating parameters for the use of wetting agent fume suppressants.

If required, compliance shall be determined by visible emission evaluations performed in accordance with procedures specified in U.S. EPA Reference Method 306.



**Final Permit-to-Install and Operate**  
Hohman Plating & Mfg. LCC  
**Permit Number:** P0110235  
**Facility ID:** 0857040217  
**Effective Date:** 10/31/2013

e. Emissions Limitation –

Visible emissions shall not exceed 5% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method -

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



**4. P021, Strip department (System C)**

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

Copper plated parts strip department, uncontrolled (System C)

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. b)(1)d.

(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) PTI 08-2436 issued July, 23, 2002	<p>The cyanide compounds from this emissions unit shall not exceed 0.49 pound per hour (lb/hour) and 2.14 tons per year (TPY).            The copper from this emissions unit shall not exceed 0.05 lb/hour and 0.22 TPY.            The tin from this emissions unit shall not exceed 0.38 lb/hour and 1.66 TPY.</p> <p>The hydroxide compounds from this emissions unit shall not exceed 0.23 lb/hour and 1.01 TPY.</p> <p>The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-17-07(A)(1).</p> <p>See b)(2)a.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-114-01 and ORC 3704.03(F)(4)(d)	See d)(2), d)(3). and e)(2).

(2) Additional Terms and Conditions

a. The hourly emissions limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the amount of cyanide compounds, copper, tin, and hydroxide compounds were employed in the strip tanks of this emissions unit.

(2) The permit to install for this emissions unit (P021) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydroxide compounds  
 TLV (mg/m<sup>3</sup>): 1.474  
 Maximum Hourly Emission Rate (lbs/hr): 0.23  
 Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 9.164  
 MAGLC (µg/m<sup>3</sup>): 35

(3) The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that



describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.)..

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:
  - a. Emissions Limitation –  
The cyanide compounds from this emissions unit shall not exceed 0.49 lb/hour.  
Applicable Compliance Method –  
Compliance shall be determined by multiplying the maximum weight of cyanide compounds added to the tanks in one hour by the company developed loss factor of 20% (1 - 0.80).



b. Emissions Limitation –

The cyanide compounds from this emissions unit shall not exceed 2.14 TPY.

Applicable Compliance Method –

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly cyanide compounds usage records for the calendar year multiplied by a company developed loss factor of 20% (1 - 0.80), divided by 2,000 pounds per ton.

c. Emissions Limitation –

The copper from this emissions unit shall not exceed 0.05 lb/hour.

Applicable Compliance Method –

Compliance shall be based upon the maximum weight of copper added to the tanks in one hour, assuming a 100% loss.

d. Emissions Limitation –

The copper from this emissions unit shall not exceed 0.22 TPY.

Applicable Compliance Method –

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly copper usage records for the calendar year, divided by 2,000 pounds per ton.

e. Emissions Limitation –

The tin emissions from this emissions unit shall not exceed 0.38 lb/hour.

Applicable Compliance Method –

Compliance shall be based upon the maximum weight of tin added to the tanks in one hour, assuming a 100% loss.

f. Emissions Limitation –

The tin emissions from this emissions unit shall not exceed 1.66 TPY.

Applicable Compliance Method –

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly tin usage records for the calendar year, divided by 2,000 pounds per ton.



g. Emissions Limitation –

The hydroxide compound emissions from this emissions unit shall not exceed 0.23 lb/hour.

Applicable Compliance Method –

Compliance shall be based upon the maximum weight of hydroxide compounds added to the tanks in one hour by a gassing rate of 10%.

h. Emissions Limitation –

The hydroxide compounds from this emissions unit shall not exceed 1.01 TPY.

Applicable Compliance Method –

Compliance shall be based upon record keeping as specified in d)(1) and shall be the sum of the monthly hydroxide compound usage records for the calendar year, divided by 2,000 pounds per ton.

i. Emissions Limitation –

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method –

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



**5. P036, Paint mixing and storage**

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

Paint mixing and storage racks

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) PTI 08-3300 issued July 26, 1995	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.6 lbs/hour and 0.406 tons per year (TPY).  See b)(2)a.

(2) **Additional Terms and Conditions**

a. The 3.6 lbs/hour VOC emission limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

c) **Operational Restrictions**

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the coating mixing operation:
  - a. The company identification for each coating mixed.
  - b. The volume, in gallons, of each coating mixed.
  - c. The VOC content of each coating mixed, in pounds per gallon.
  - d. The density of each coating mixed, in pounds per gallon.
  - e. The VOCs emission rate for all coatings mixed, in pounds, determined by multiplying the weight of coating mixed [d)(1)b. multiplied by d)(1)d.] by the emissions factor of 0.015 lb VOC per pound of coating.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations specified in b) shall be determined in accordance with the following methods:
  - a. Emissions Limitation –  
The VOC emissions from this emissions unit shall not exceed 3.6 lbs/hour.  
Applicable Compliance Method - .  
Compliance shall be determined by multiplying the maximum hourly mixing rate (240 lbs/hour) by the emissions factor of 0.015 lb VOC/lb coating. (Reference: U.S. EPA, AP-42, Section 6.4, Table 6.4-1, 1/95).
  - b. Emissions Limitation –  
The VOC emissions from this emissions unit shall not exceed 0.406 TPY.  
Applicable Compliance Method - .  
Compliance shall be determined according to the record keeping requirements of d)(1) and the sum of the VOC emissions for calendar year divided by 2,000 pounds per ton.



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g) Miscellaneous Requirements

- (1) None.



6. Emissions Unit Group -Strip Systems w/wet scrubbers: (System B and System D),

EU ID	Operations, Property and/or Equipment Description
P020	Strip plating pretreatment system with packed bed wet scrubber (System B)
P022	Strip & post treatment system with packed bed wet scrubber (System D)

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. b)(1)d.

(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) PTI 08-03320 issued July 18, 2002	<p><u>Emissions Unit P020:</u> The nitric acid emissions from this emissions unit shall not exceed 0.513 pound per hour (lb/hour) and 1.60 tons per year (TPY). See b)(2)a. and b)(2)(b).</p> <p><u>Emissions Unit P022:</u> The nitric acid emissions from this emissions unit shall not exceed 0.216 lb/hour and 0.675 TPY. The hydrochloric acid emissions from this emissions unit shall not exceed 0.03 lb/hour and 0.13 TPY</p> <p>The sulfuric acid emissions from this emissions unit shall not exceed 0.042 lb/hour and 0.13 TPY.</p> <p>See b)(2)a. and b)(2)(b).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	The visible particulate emissions from each emissions unit shall not exceed 20% opacity, as a six-minute average.
c.	OAC rule 3745-17-11(B)	The emissions limitations specified by this rule are less stringent than the emissions limitations established according OAC ruel3745-31-05(A)(3).
d.	OAC rule 3745-114-01 and ORC 3704.03(F)(4)(d)	See d)(5), d)(6) and e)(2).

(2) Additional Terms and Conditions

- a. The hourly emissions limitations were established to reflect the potential to emit for each emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- b. The emissions from each emissions unit shall be vented to a packed bed wet scrubber at all times either emissions unit is in operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable pressure drop across the scrubber for each emissions unit, that shall be maintained in order to demonstrate compliance, shall not be less than 0.25 pound per square inch (gauge).
- (2) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 3 gallons per minute.
- (3) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range for the pH of the scrubber liquid, that shall be maintained in order to demonstrate compliance, is between 5 and 10.
- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in pounds per square inch, gauge), the scrubber liquid flow rate for each scrubber (in gallons per minute), and the scrubber liquid pH for each scrubber during operation of each emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across each scrubber and the scrubber liquid pH and flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturers recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee.



Whenever the monitored value for any parameter deviates from the ranges or minimum limits established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable ranges, or at or above the minimum limits specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop, flow rate, and pH readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop, liquid flow rate, and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or pH based upon information obtained during future performance tests that demonstrate compliance with the allowable nitric acid emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.



- (5) The permit to install for emissions unit (P020) was evaluated based on the actual materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: nitric acid

TLV (mg/m<sup>3</sup>): 5.16

Maximum Hourly Emission Rate (lbs/hour): 0.513

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 14.9

MAGLC (µg/m<sup>3</sup>): 123

- (6) The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.



The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for these emissions units:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, the liquid flow rate, or the pH were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when either emissions unit was in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in e)(2)a. or e)(2)b. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action, that would bring the pressure drop and liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in e)(2)a. or e)(2)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations specified in section b) for emissions unit P020 shall be determined in accordance with the following methods:
    - a. Emissions Limitation –  
The nitric acid emissions from this emissions unit shall not exceed 0.513 lb/hour.  
Applicable Compliance Method –  
Compliance with this allowable emission rate was demonstrated in a performance test conducted on November 18, 1997 with results showing an average nitric acid emission rate of 0.093 lb/hour. Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.
    - b. Emissions Limitation –  
The nitric acid emissions from this emissions unit shall not exceed 1.60 TPY.



Applicable Compliance Method –

The 1.60 TPY emissions limitation was developed by multiplying the maximum hourly emission rate by the maximum annual operating schedule (6,240 hours per year) and dividing by 2,000 pound per ton.

c. Emissions Limitation –

The visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method –

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

(2) Compliance with the Emissions Limitations specified in section b) for emissions unit P022 shall be determined in accordance with the following methods:

a. Emissions Limitation –

The nitric acid emissions from this emissions unit shall not exceed 0.216 lb/hour.

Applicable Compliance Method –

Compliance with this allowable emission rate was demonstrated in a performance test conducted on November 18, 1997 with results showing an average nitric acid emission rate of 0.023 lb/hour. Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.

b. Emissions Limitation –

The nitric acid emissions from this emissions unit shall not exceed 0.675 TPY.

Applicable Compliance Method –

The 0.675 TPY emissions limitation was developed by multiplying the maximum hourly emission rate by the maximum annual operating schedule (6,240 hours per year) and dividing by 2,000 pound per ton.

c. Emissions Limitation –

The hydrochloric acid emissions from this emissions unit shall not exceed 0.03 lb/hour.



Applicable Compliance Method –

Compliance shall be determined by multiplying the maximum amount of hydrochloric acid solution added to the tank in one hour by a maximum hydrochloric acid concentration of 36% and a gassing rate of 10%. This uncontrolled emission rate shall then be multiplied by a scrubber control efficiency of 90% (1 - 0.90). Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.

d. Emissions Limitation –

The hydrochloric acid emissions from this emissions unit shall not exceed 0.13 TPY

Applicable Compliance Method –

The 0.13 TPY emission limitation was developed by multiplying the 0.03 lb/hour emission rate by the maximum annual operating schedule (6,240 hours) and dividing by 2,000 pound per ton.

e. Emissions Limitation –

The sulfuric acid emissions from this emissions unit shall not exceed 0.042 lb/hour.

Applicable Compliance Method –

Compliance shall be determined by multiplying the maximum amount of sulfuric acid added to the tank in one hour by a gassing rate of 10% (0.10) and a scrubber control efficiency of 90% (1 - 0.90). Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.

f. Emissions Limitation –

The sulfuric acid emissions from this emissions unit shall not exceed 0.13 TPY.

Applicable Compliance Method –

The 0.133 TPY emission limitation was developed by multiplying the 0.0424 lb/hour emission rate by a maximum annual operating schedule (6,240 hours) and dividing by 2,000 pound per ton.

g. Emissions Limitation –

The visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a six-minute average.



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Applicable Compliance Method –

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements
  - (1) None.