State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
CUYAHOGA COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 13-04615
Fac ID: 1318000221

DATE: 4/25/2006

A-Brite Plating Company
Kurt Schuster
333 West 121 Street
Cleveland, OH 44111

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 may be issued in proposed of 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 a fee of **$800** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CLAA** **PA**

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL
13-04615 FOR AN AIR CONTAMINANT SOURCE FOR **A-Brite Plating Company**

On 4/25/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **A-Brite Plating Company**, located at **3000 West 121 Street, Cleveland**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04615:

Two decorative chrome plastic part plating lines -- P009 and P010.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL

13-04615

Application Number:	13-04615
Facility ID:	1318000221
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	A-Brite Plating Company
Person to Contact:	Kurt Schuster
Address:	333 West 121 Street Cleveland, OH 44111

Location of proposed air contaminant source(s) [emissions unit(s)]:
3000 West 121 Street
Cleveland, Ohio

Description of proposed emissions unit(s):
Two decorative chrome plastic part plating lines -- P009 and P010.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. 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

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. 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.

B. 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

Pollutant	Tons Per Year
Chromium	6.00 e-4

Emissions Unit ID: **P009**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - Decorative Chrome Plating Line B employing a fume suppressant and spray chamber scrubber	OAC rule 3745-31-05(A)(3)	Chromium Emissions shall not exceed 3.00 e-4 tons per year.
	40 CFR Part 63 Subpart N	See Additional Terms and Conditions Section 2a Below.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions shall not exceed 20% opacity as a 3-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63 Subpart N.

2. Additional Terms and Conditions

2.a The permittee using a chemical fume suppressant containing a wetting agent shall not allow the surface tension of the electroplating or anodizing bath to exceed 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) at any time during operation of the tank.

B. Operational Restrictions

1. The permittee shall implement the following work practices:

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

b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

c Determination of whether acceptable operation and maintenance procedures are being used shall be based on the facility records, which shall be made available to the regulating agency [Cleveland Division of Air Quality (CDAQ)] upon request, and which may include, but not be 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 CDAQ may require that the permittee make changes to the operation and maintenance plan if that plan:

i. does not address a malfunction that has occurred;

ii. fails to provide for the operation of the emissions unit, 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

iii. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment, and/or monitoring equipment as quickly as practicable.

2. The permittee shall prepare an operation and maintenance plan to be implemented no later than the startup of the unit. The plan shall include the following elements:

a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device, 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 plan shall incorporate the work practice standards for the add-on air pollution control device and monitoring equipment required to demonstrate compliance with the standard.

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 device(s), and process and control system monitoring equipment, and for implementing corrective actions to address any 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 by phone to the CDAQ within 2 working days following the actions performed inconsistent with the plan. This verbal report shall be followed by a letter within 7 working days following the event, unless the permittee makes alternative reporting arrangements, in advance, with the CDAQ.

g. The permittee shall maintain the written operation and maintenance plan on record at the facility; and it shall be made readily available for inspection, at the request of the CDAQ and for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall maintain previous versions of the plan at the facility for a period of five years following each revision; this/these superceded versions of the plan shall also be made available for inspection, if so requested by the CDAQ.

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 of 40 CFR 63.342(f)(3).

3. If a stalagmometer or tensiometer is used to measure surface tension of the electroplating or anodizing bath, the permittee shall incorporate the maintenance and operational practices recommended by the manufacturer into the operation and maintenance plan for the instrument. These maintenance and operational practices shall be conducted at least once per quarter, unless a shorter schedule is suggested by the manufacturer.

C. Monitoring and/or Recordkeeping Requirements

1. In addition to fulfilling all record keeping requirements contained in the General Provisions to 40 CFR Part 63, Subpart A, as they apply to the emissions unit, the permittee shall also maintain the following records:

   a. inspection records for the add-on air pollution control device and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have been performed. 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; and

l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and §63.9 and §63.10 of 40 CFR Part 63, subpart A.

m. records of the date and time that fume suppressants are added to the electroplating or anodizing bath.

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

D. Reporting Requirements

1. The permittee shall submit a Notification of Performance Test to the CDAQ at least 60 calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) of 40 CFR Part 63, subpart A shall apply to the emissions unit.

2. The permittee shall report, to the CDAQ, the results of any performance test conducted within 30 days of completion of such test. Reports of performance test results shall also be submitted in the notification of compliance status report, no later than 90 days following the completion of the performance test.

3. The permittee shall submit a Notification of Compliance Status to the CDAQ, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall include the following information for each affected emissions unit:

   a. the applicable emission limitations and the methods that were used to determine compliance with this limitation;

   b. the test report, documenting the results of the performance test and including the following elements:

      i. a brief description of the process;

ii. the description of the sampling location;

iii. the description of sampling and analytical procedures and any modifications to the standard procedures;

iv. the test results;

v. quality assurance procedures and results;

vi. records of operating conditions during the test, preparation of standards, and calibration procedures;

vii. raw data sheets for field sampling and field and laboratory analyses; and

viii. any other information required by the test method;

c. the surface tension measurement and frequency of each measurement during the reporting period;

d. documentation that the actual cumulative rectifier capacity is less than 60 million amp-hr/year, to demonstrate that the facility is a small hard chromium electroplating facility;

e. 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;

f. the methods that shall be used to determine continuous compliance;

g. a description of the air pollution control method(s) used for each emission point;

h. a statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards; and

i. a statement by the owner or operator as to whether the emissions unit is in compliance.

4. The permittee shall prepare and submit annual compliance status reports (unless a more frequent reporting frequency has been determined) to the CDAQ in order 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. a description of the source, type of process performed, and the air pollution control method and monitoring device(s) that is/are/shall be used to demonstrate continuous compliance;

c. an identification of the operating parameter(s) that is/are/shall be monitored for compliance determination;

d. the relevant emission limitation for the emissions unit, and the operating parameter value(s), or range of values, established during compliance testing and reported in the Notification of Compliance;

e. the beginning and ending dates of the reporting period;

f. the total operating time of the emissions unit during the reporting period;

g. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period; and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;

h. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;

i. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;

j. a description of any changes in monitoring, processes, or controls since the last reporting period;

k. the date of the report;

l. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. the report shall be completed annually and retained on site, and made available to the regulating agency upon request.

5. The permittee, qualifying as an area source, shall submit annual ongoing compliance summary reports, unless both of the following conditions demonstrate that more frequent reporting is required:

   a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and

   b. the total duration of malfunctions of the add-on air pollution control device and/or monitoring equipment is 5 percent or greater of the total operating time.

   Once the permittee reports an exceedance or malfunction, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.

6. The regulating agency may determine on a case-by-case basis if the summary report shall be completed and submitted more frequently than annually, or if the annual report may be retained on site (for inspection upon request) rather than requiring it be submitted.

7. The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual (or semi-annual if quarterly) and/or may be permitted to maintain the report on site, rather than submit an annual or semi-annual report, if all of the following conditions are met:

   a. for 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit;

   b. the permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit; and

   c. the regulating agency does not object to a reduced reporting frequency.

   In deciding whether to approve a reduced reporting frequency or to allow the report to

be retained on site, the regulating agency may request to review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change in reporting frequency, or the record keeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. If the permittee's request is disapproved, the regulating agency will notify the permittee in writing within 45 days after receiving notice. This 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.

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 semiannually, 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.

E. Testing Requirements

1. Performance test results shall be documented in complete test reports that contain the following information:

   a. a brief process description;

   b. sampling location description(s);

   c. a description of sampling and analytical procedures and any modifications to standard procedures;

   d. test results;

   e. quality assurance procedures and results;

   f. records of operating conditions during testing, preparation of standards, and calibration procedures;

   g. raw data sheets for field sampling and field and laboratory analyses;

   h. documentation of calculations; and

i. any other information required by the test method.

The test plan shall be submitted to the CDAQ at least 60 days before the date the test is scheduled to begin.

2. Any performance test used to demonstrate compliance shall meet the following requirements:

   a. the test methods and procedures identified in this permit shall be used during the performance test;

   b. the performance test shall be conducted under representative operating *and/or worst-case* conditions;

   c. the performance test report shall contain all the information required per 40 CFR 63.344(a); and

   d. the permittee shall have sufficient data to establish the operating parameter value(s) that corresponds to compliance as required for continuous compliance monitoring

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit, in order to demonstrate compliance with the surface tension limitation contained in this permit:

   a. Method 306B, "Surface Tension Measurement and Record keeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities," shall be used to measure the surface tension of the electroplating and/or anodizing bath.

   b. The stalagmometer or tensiometer shall be operated such that representative measurements of surface tension from the affected emissions unit are obtained. Verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written accuracy specifications or recommendations for operation and calibration of the system(s).

   c. A representative from the CDAQ shall be permitted to witness the measurement(s), upon request.

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

a. Emission Limitation:
Chromium emissions shall not exceed 3.00 e-4 tons per year

Applicable Compliance Method:
The following equation (based on AP-42 Section 12.20) and emission factors from AP 42, Table 12.20-1) shall be used:

Ea = (1.2 e-6 grains/dscf)*(100 dscf/A-hr)*(1 lb/7000 grains)*(1 ton/2000 lbs)* Rc*Hr

Where:

Ea = Actual annual chromium emissions (tons per year)

Rc = Rectifier Capacity in amps (A)

Hr = Operating hours per year

b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 3-minute average, except as provided by rule.

Applicable Compliance Method:
If required by the CDAQ, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

F. Miscellaneous Requirements

None.

Emissions Unit ID: **P010**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P010 - Decorative Chrome Plating Line A employing a fume suppressant and spray chamber scrubber	OAC rule 3745-31-05(A)(3)	Chromium Emissions shall not exceed 3.00 e-4 tons per year.
	40 CFR Part 63 Subpart N	See Additional Terms and Conditions Section 2.a below.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions shall not exceed 20% opacity as a 3-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63 Subpart N.

2. Additional Terms and Conditions

2.a The permittee using a chemical fume suppressant containing a wetting agent shall not allow the surface tension of the electroplating or anodizing bath to exceed 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) at any time during operation of the tank.

B. Operational Restrictions

1. The permittee shall implement the following work practices:

a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the chromium electroplating or anodizing tank, including

the associated air pollution control device(s) and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

c Determination of whether acceptable operation and maintenance procedures are being used shall be based on the facility records, which shall be made available to the regulating agency [Cleveland Division of Air Quality (CDAQ)] upon request, and which may include, but not be 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 CDAQ may require that the permittee make changes to the operation and maintenance plan if that plan:

i. does not address a malfunction that has occurred;

ii. fails to provide for the operation of the emissions unit, 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

iii. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment, and/or monitoring equipment as quickly as practicable.

2. The permittee shall prepare an operation and maintenance plan to be implemented no later than the startup of the unit. The plan shall include the following elements:

a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device, 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 plan shall incorporate the work practice standards for the add-on air pollution control device and monitoring equipment required to demonstrate compliance with the standard.

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 device(s), and process and control system monitoring equipment, and for implementing corrective actions to address any 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 by phone to the CDAQ within 2 working days following the actions performed inconsistent with the plan. This verbal report shall be followed by a letter within 7 working days following the event, unless the permittee makes alternative reporting arrangements, in advance, with the CDAQ.

g. The permittee shall maintain the written operation and maintenance plan on record at the facility; and it shall be made readily available for inspection, at the request of the CDAQ and for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall maintain previous versions of the plan at the facility for a period of five years following each revision; this/these superceded versions of the plan shall also be made available for inspection, if so requested by the CDAQ.

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 of 40 CFR 63.342(f)(3).

3. If a stalagmometer or tensiometer is used to measure surface tension of the electroplating or anodizing bath, the permittee shall incorporate the maintenance and operational practices recommended by the manufacturer into the operation and maintenance plan for the instrument. These maintenance and operational practices shall be conducted at least once per quarter, unless a shorter schedule is suggested by the manufacturer.

C. Monitoring and/or Recordkeeping Requirements

1. In addition to fulfilling all record keeping requirements contained in the General Provisions to 40 CFR Part 63, Subpart A, as they apply to the emissions unit, the permittee shall also maintain the following records:

   a. inspection records for the add-on air pollution control device and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have been performed. 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; and

l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and §63.9 and §63.10 of 40 CFR Part 63, subpart A.

m. records of the date and time that fume suppressants are added to the electroplating or anodizing bath.

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

D. Reporting Requirements

1. The permittee shall submit a Notification of Performance Test to the CDAQ at least 60 calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) of 40 CFR Part 63, subpart A shall apply to the emissions unit.

2. The permittee shall report, to the CDAQ, the results of any performance test conducted within 30 days of completion of such test. Reports of performance test results shall also be submitted in the notification of compliance status report, no later than 90 days following the completion of the performance test.

3. The permittee shall submit a Notification of Compliance Status to the CDAQ, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall include the following information for each affected emissions unit:

   a. the applicable emission limitations and the methods that were used to determine compliance with this limitation;

   b. the test report, documenting the results of the performance test and including the following elements:

      i. a brief description of the process;

      ii. the description of the sampling location;

iii. the description of sampling and analytical procedures and any modifications to the standard procedures;

iv. the test results;

v. quality assurance procedures and results;

vi. records of operating conditions during the test, preparation of standards, and calibration procedures;

vii. raw data sheets for field sampling and field and laboratory analyses; and

viii. any other information required by the test method;

c. the surface tension measurement and frequency of each measurement during the reporting period;

d. documentation that the actual cumulative rectifier capacity is less than 60 million amp-hr/year, to demonstrate that the facility is a small hard chromium electroplating facility;

e. 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;

f. the methods that shall be used to determine continuous compliance;

g. a description of the air pollution control method(s) used for each emission point;

h. a statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards; and

i. a statement by the owner or operator as to whether the emissions unit is in compliance.

4. The permittee shall prepare and submit annual compliance status reports (unless a more frequent reporting frequency has been determined) to the CDAQ in order 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. a description of the source, type of process performed, and the air pollution control method and monitoring device(s) that is/are/shall be used to demonstrate continuous compliance;

c. an identification of the operating parameter(s) that is/are/shall be monitored for compliance determination;

d. the relevant emission limitation for the emissions unit, and the operating parameter value(s), or range of values, established during compliance testing and reported in the Notification of Compliance;

e. the beginning and ending dates of the reporting period;

f. the total operating time of the emissions unit during the reporting period;

g. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period; and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;

h. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;

i. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;

j. a description of any changes in monitoring, processes, or controls since the last reporting period;

k. the date of the report;

l. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. the report shall be completed annually and retained on site, and made available to the regulating agency upon request.

5. The permittee, qualifying as an area source, shall submit annual ongoing compliance summary reports, unless both of the following conditions demonstrate that more frequent reporting is required:

   a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and

   b. the total duration of malfunctions of the add-on air pollution control device and/or monitoring equipment is 5 percent or greater of the total operating time.

   Once the permittee reports an exceedance or malfunction, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.

6. The regulating agency may determine on a case-by-case basis if the summary report shall be completed and submitted more frequently than annually, or if the annual report may be retained on site (for inspection upon request) rather than requiring it be submitted.

7. The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual (or semi-annual if quarterly) and/or may be permitted to maintain the report on site, rather than submit an annual or semi-annual report, if all of the following conditions are met:

   a. for 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit;

   b. the permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit; and

   c. the regulating agency does not object to a reduced reporting frequency.

   In deciding whether to approve a reduced reporting frequency or to allow the report to be retained on site, the regulating agency may request to review information concerning the facility's previous performance history during the 5-year record keeping period prior

to the intended change in reporting frequency, or the record keeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. If the permittee's request is disapproved, the regulating agency will notify the permittee in writing within 45 days after receiving notice. This 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.

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 semiannually, 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.

E. Testing Requirements

1. Performance test results shall be documented in complete test reports that contain the following information:

   a. a brief process description;

   b. sampling location description(s);

   c. a description of sampling and analytical procedures and any modifications to standard procedures;

   d. test results;

   e. quality assurance procedures and results;

   f. records of operating conditions during testing, preparation of standards, and calibration procedures;

   g. raw data sheets for field sampling and field and laboratory analyses;

   h. documentation of calculations; and

   i. any other information required by the test method.

The test plan shall be submitted to the CDAQ at least 60 days before the date the test is scheduled to begin.

2. Any performance test used to demonstrate compliance shall meet the following requirements:

   a. the test methods and procedures identified in this permit shall be used during the performance test;

   b. the performance test shall be conducted under representative operating *and/or worst-case* conditions;

   c. the performance test report shall contain all the information required per 40 CFR 63.344(a); and

   d. the permittee shall have sufficient data to establish the operating parameter value(s) that corresponds to compliance as required for continuous compliance monitoring

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit, in order to demonstrate compliance with the surface tension limitation contained in this permit:

   a. Method 306B, "Surface Tension Measurement and Record keeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities," shall be used to measure the surface tension of the electroplating and/or anodizing bath.

   b. The stalagmometer or tensiometer shall be operated such that representative measurements of surface tension from the affected emissions unit are obtained. Verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written accuracy specifications or recommendations for operation and calibration of the system(s).

   c. A representative from the CDAQ shall be permitted to witness the measurement(s), upon request.

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

   a. Emission Limitation:
      Chromium emissions shall not exceed 3.00 e-4 tons per year

Applicable Compliance Method:
The following equation (based on AP-42 Section 12.20) and emission factors from AP 42, Table 12.20-1) shall be used:

Ea = (1.2 e-6 grains/dscf)*(100 dscf/A-hr)*(1 lb/7000 grains)*(1 ton/2000 lbs)* Rc*Hr

Where:

Ea = Actual annual chromium emissions (tons per year)

Rc = Rectifier Capacity in amps (A)

Hr = Operating hours per year

b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 3-minute average, except as provided by rule.

Applicable Compliance Method:
If required by the CDAQ, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

F. Miscellaneous Requirements

None.