State of Ohio Environmental Protection Agency

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

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
BUTLER COUNTY
Application No: 14-04972
DATE: 8/31/2000

Intaglio Vivi Color Alliance Ltd
Gregg Pigg
4014 Tytus Ave
Middletown, OH 45042

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 **$400** will be due. Please do not submit any payment now.

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

Very truly yours,

Thomas G. Rigo

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

cc: **USEPA** **HCDES** **KY**
IN **OH-KY-In Reg Coun of Govt**

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 14-04972

Application Number:	14-04972
APS Premise Number:	1409010438
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Intaglio Vivi Color Alliance Ltd
Person to Contact:	Gregg Pigg
Address:	4014 Tytus Ave Middletown, OH 45042

Location of proposed air contaminant source(s) [emissions unit(s)]:
4014 Tytus Ave
Middletown, **Ohio**

Description of proposed emissions unit(s):
Two Hard Chromium Electroplating Tanks with Composite Mesh Pad Systems.

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

Part I - GENERAL TERMS AND CONDITIONS

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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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
Total Chromium	0.0022
Total Chromium	0.0022

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
P002 - Hard Chromium Electroplating Tank #1 with Composite Mesh Pad System	OAC rule 3745-31-05(A)(3)	0.00025 lb total chromium/hr, 0.0011 TPY total chromium See sections A.2.a. and c. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart N.
	40 CFR Part 63 Subpart N	See Term A.2.a
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	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

2.a The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.03 mg/dscm (1.3×10^{-5} gr/dscf).

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a composite mesh pad system and compliance with 40 CFR Part 63, Subpart N.

2.c Visible particulate emissions shall not exceed 0 percent opacity as a 6 minute average.

B. Operational Restrictions

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

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

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Hamilton County Department of Environmental Services, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emission unit. Based on this information, the Hamilton County Department of Environmental Services may require that the permittee make changes to the operation and maintenance plan if that plan:

   a. does not address a malfunction that has occurred;

   b. fails to provide for the operation of the emission units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or

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

4. The permittee shall prepare an operation and maintenance plan to be implemented no later than January 25, 1997. The plan shall be incorporated by reference into the Title V permit and 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 (if such a device is used to comply with the emissions

limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.

b. The O/M plan shall incorporate the following work practice standards:

   i. Visually inspect the device at least once per quarter to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.

   ii. Visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.

   iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.

   iv. Perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.

c. If a pitot tube is used for monitoring, the O/M plan shall incorporate the following work practice standards to be performed at least once per quarter:

   i. Backflush with water, or remove from the duct and rinse with fresh water.

   ii. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained.

   iii. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued.

d. 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.

e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.

f. 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.

g. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Hamilton County Department of Environmental Services.

h. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Hamilton County Department of Environmental Services for the life of the emission unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the Hamilton County Department of Environmental Services for a period of five years after each revision to the plan.

i. 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.

C. Monitoring and/or Recordkeeping Requirements

1. <u>Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance</u>

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

b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept ±1 inch of water column from this value as the compliant range.

c. On and after the date on which the initial performance test is required to be completed

under §63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating. To be in compliance, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the most recent performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

2. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.

3. The permittee also shall maintain the following records:

   a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.

   b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.

   c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.

   d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.

   e. Other records, which may take the form of checklists, necessary to demonstrate consistence 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 emission unit during the reporting period.

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.

D. Reporting Requirements

1. The permittee shall fulfill all reporting requirement as outlined in 40 CFR part 63 subpart A. These reports shall be made to the Hamilton County Department of Environmental Services and shall be sent by U.S. mail, fax or by another courier.

   a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.

   b. Submittals sent by other methods shall be received by the Hamilton County Department of Environmental Services before the specified date.

2. The permittee shall submit to the Hamilton County Department of Environmental Services an initial notification report no later than July 24, 1995 that contains the following information:

   a. The name, title, and address of the owner or operator.

   b. The address (i.e., physical location) of the emissions unit.

   c. Identification of the applicable emission limitations and compliance date.

   d. A statement of whether the affected emissions unit is located at a major source or at an area source.

   e. A brief description of each affected emission unit, including the type of process operation performed.

   f. The maximum potential cumulative potential rectifier capacity.

g. A statement of whether the emissions unit is located at a small or a large, hard chromium facility and whether this will be demonstrated through actual or maximum potential cumulative rectifier capacity

h. A statement of whether the permittee will limit the maximum potential cumulative rectifier capacity such that the hard chromium electroplating facility is considered small.

3. The permittee shall submit a Notification of Performance Test to the appropriate Ohio EPA District Office or local air agency at least 60 calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) of 40 CFR Part 63, subpart A apply.

4. The permittee shall submit a Notification of Compliance Status to the Hamilton County Department of Environmental Services 90 days after the performance test is completed, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall list for each affected emissions unit:

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

b. If a performance test is required, the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit, including measurements and calculations to support special compliance provisions for multiple emissions units controlled by a common add-on air pollution control device.

c. The type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm or mg/hr if the emissions unit is using the special provisions for multiple emissions units controlled by a common add-on air pollution control device. (For emissions units not required to conduct a performance test, the surface tension measurement may fulfill this requirement.)

d. For each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit.

e. The methods that will be used to determine continuous compliance.

f. A description of the air pollution control technique used for each emission point.

g. A statement that the permittee has completed and has on file the operation and

maintenance plan as required by the work practice standards.

h. A statement by the owner or operator as to whether the emissions unit is in compliance.

5. The permittee shall report to the Hamilton County Department of Environmental Services the results of any performance test conducted. The report shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status report required by this section.

6. The permittee shall prepare an ongoing compliance status report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to document the ongoing compliance status of the emissions unit. This report shall include the following:

a. The company name and address of the emissions unit.

b. An identification of the operating parameter that is monitored for compliance determination.

c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.

d. The beginning and ending dates of the reporting period.

e. The total operating time of the emissions unit during the reporting period.

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

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

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

i. A description of any changes in monitoring, processes, or controls since the last reporting period.

j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

k. The date of the report.

7. The permittee shall submit semiannual reports if the following conditions are met:

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

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

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

9. The Hamilton County Department of Environmental Services may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the emissions unit.

10. The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report on site 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 recordkeeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit.

c. The Hamilton County Department of Environmental Services does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met:

i. The permittee notifies the Hamilton County Department of Environmental Services in writing of its intentions to make such a change. Hamilton County Department of Environmental Services may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emission 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 Hamilton County Department of Environmental Services 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.

ii. If monitoring data show that the emissions unit is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.

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.
   i. Any other information required by the test method.

   The test plan shall be made available to the Hamilton County Department of Environmental

Services prior to testing, if requested. The results of tests conducted prior to December 1991, in which Method 306A was used to demonstrate the performance of a control technique, are not acceptable.

2. The permittee shall use the following test methods to conduct an initial performance test:

   a. Method 306 or Method 306A, "Determination of Chromium Emissions From Decorative and Hard Chromium Electroplating and Anodizing Operations" shall be used to determine the chromium concentration from hard or decorative chromium electroplating tanks or chromium anodizing tanks.

i. The sampling time and sample volume for each run of Methods 306 and 306A shall be at least 120 minutes and 1.7 dscm (60 dscf), respectively.

ii. Methods 306 and 306A allow the measurement of either total chromium or hexavalent chromium emissions. Emissions units using chromic acid baths can demonstrate compliance with the emission limits by measuring either the total chromium or hexavalent chromium concentration. Hence, the hexavalent chromium concentration measured by these methods is equal to the total chromium concentration for the affected operations.

b. The California Air Resources Board (CARB) Method 425 may be used to determine the chromium concentration from hard and decorative chromium electroplating tanks and chromium anodizing tanks if the following conditions are met:

i. If a colorimetric analysis method is used, the sampling time and volume shall be sufficient to result in 33-66 micrograms of catch in the sampling train.

ii. If an Atomic Absorption Graphite Furnace (AAGF) or Ion Chromatography (with a Post-column Reactor (ICPCR) analyses) is used, the sampling time and volume should be sufficient to result in a sample catch that is 5 to 10 times the minimum detection limit of the analytical method (i.e., 1.0 microgram per liter of sample for AAGF and 0.5 microgram per liter of sample for ICPCR).

iii. A minimum of three separate runs must be conducted. The other requirements of §63.7 of 40 CFR Part 63, subpart A must also be met.

3. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected emissions unit are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. Specifications for differential pressure measurement devices used to measure pressure drop across a control system shall be in accordance with the manufacturer's accuracy specifications.

4. The permittee shall measure the pressure drop across the add-on air pollution control device in accordance with the following guidelines:

a. Pressure taps shall be installed at any of the following locations:

i. At the inlet and outlet of the control system. The inlet tap should be installed in

the ductwork just prior to the control device and the corresponding outlet pressure tap should be installed on the outlet side of the control device prior to the blower or on the downstream side of the blower.

ii. On each side of the packed bed within the control system or on each side of each mesh pad within the control system.

iii. On the front side of the first mesh pad and back side of the last mesh pad within the control system.

b. Pressure taps shall be sited at locations that are:

i. As free from pluggage as possible and away from any flow disturbances such as cyclonic demisters.

ii. Situated such that no air infiltration at the measurement site will occur that could bias the measurement.

c. Pressure taps shall be constructed of either polyethylene, polybutylene, or other nonreactive materials.

d. Nonreactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop.

e. Any of the following pressure gauges can be used to monitor pressure drop: a magnehelic gauge, an included manometer, or a "U" tube manometer.

f. Prior to connecting any pressure lines to the pressure gauge(s), each gauge shall be zeroed. No calibration of the pressure gauges is required.

5. Compliance with the visible particulate emission limit in A.2. shall be determined in accordance with Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

Emissions Unit ID: **P003**

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
P003 - Hard Chromium Electroplating Tank #2 with Composite Mesh Pad System	OAC rule 3745-31-05(A)(3)	0.00025 lb total chromium/hr, 0.0011 TPY total chromium See sections A.2.a. and c. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart N.
	40 CFR Part 63 Subpart N	See Term A.2.a
	OAC rule 3745-17-11	The emission limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitations 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

2.a The permittee shall not allow the concentration of total chromium in the exhaust gases

discharged to the atmosphere to exceed 0.03 mg/dscm (1.3×10^{-5} gr/dscf).

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a composite mesh pad system and compliance with 40 CFR Part 63, Subpart N.

2.c Visible particulate emissions shall not exceed 0% percent opacity as a 6 minute average.

B. Operational Restrictions

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

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

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Hamilton County Department of Environmental Services, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emission unit. Based on this information, the Hamilton County Department of Environmental Services may require that the permittee make changes to the operation and maintenance plan if that plan:

   a. does not address a malfunction that has occurred;

   b. fails to provide for the operation of the emission units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or

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

4. The permittee shall prepare an operation and maintenance plan to be implemented no later than January 25, 1997. The plan shall be incorporated by reference into the Title V permit and 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 (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a

standardized checklist to document the operation and maintenance of the equipment.

b. The Operation and Maintenance plan shall incorporate the following work practice standards:

   i. Visually inspect the device at least once per quarter to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.

   ii. Visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.

   iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.

   iv. Perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.

c. If a pitot tube is used for monitoring, the O/M plan shall incorporate the following work practice standards to be performed at least once per quarter:

   i. Backflush with water, or remove from the duct and rinse with fresh water.

   ii. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained.

   iii. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued.

d. 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.

e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.

f. 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.

g. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Hamilton County Department of Environmental Services.

h. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Hamilton County Department of Environmental Services for the life of the emission unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the Hamilton County Department of Environmental Services for a period of five years after each revision to the plan.

i. 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.

C. Monitoring and/or Recordkeeping Requirements

1. <u>Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance</u>

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

b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept ±1 inch of water column from this value as the compliant range.

c. On and after the date on which the initial performance test is required to be completed

under §63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating. To be in compliance, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the most recent performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

2. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.

3. The permittee also shall maintain the following records:

   a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.

   b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.

   c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.

   d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.

   e. Other records, which may take the form of checklists, necessary to demonstrate consistence 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 emission unit during the reporting period.

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.

D. Reporting Requirements

1. The permittee shall fulfill all reporting requirement as outlined in 40 CFR part 63 subpart A. These reports shall be made to the Hamilton County Department of Environmental Services and shall be sent by U.S. mail, fax or by another courier.

   a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.

   b. Submittals sent by other methods shall be received by the Hamilton County Department of Environmental Services before the specified date.

2. The permittee shall submit to the Hamilton County Department of Environmental Services an initial notification report no later than July 24, 1995 that contains the following information:

   a. The name, title, and address of the owner or operator.

   b. The address (i.e., physical location) of the emissions unit.

   c. Identification of the applicable emission limitations and compliance date.

   d. A statement of whether the affected emissions unit is located at a major source or at an area source.

   e. A brief description of each affected emission unit, including the type of process operation performed.

   f. The maximum potential cumulative potential rectifier capacity.

g. A statement of whether the emissions unit is located at a small or a large, hard chromium facility and whether this will be demonstrated through actual or maximum potential cumulative rectifier capacity

h. A statement of whether the permittee will limit the maximum potential cumulative rectifier capacity such that the hard chromium electroplating facility is considered small.

3. The permittee shall submit a Notification of Performance Test to the appropriate Ohio EPA District Office or local air agency at least 60 calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) of 40 CFR Part 63, subpart A apply.

4. The permittee shall submit a Notification of Compliance Status to the Hamilton County Department of Environmental Services 90 days after the performance test is completed, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall list for each affected emissions unit:

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

b. If a performance test is required, the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit, including measurements and calculations to support special compliance provisions for multiple emissions units controlled by a common add-on air pollution control device.

c. The type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm or mg/hr if the emissions unit is using the special provisions for multiple emissions units controlled by a common add-on air pollution control device. (For emissions units not required to conduct a performance test, the surface tension measurement may fulfill this requirement.)

d. For each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit.

e. The methods that will be used to determine continuous compliance.

f. A description of the air pollution control technique used for each emission point.

g. A statement that the permittee has completed and has on file the operation and

maintenance plan as required by the work practice standards.

h. A statement by the owner or operator as to whether the emissions unit is in compliance.

5. The permittee shall report to the Hamilton County Department of Environmental Services the results of any performance test conducted. The report shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status report required by this section.

6. The permittee shall prepare an ongoing compliance status report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to document the ongoing compliance status of the emissions unit. This report shall include the following:

a. The company name and address of the emissions unit.

b. An identification of the operating parameter that is monitored for compliance determination.

c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.

d. The beginning and ending dates of the reporting period.

e. The total operating time of the emissions unit during the reporting period.

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

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

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

i. A description of any changes in monitoring, processes, or controls since the last reporting period.

j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

k. The date of the report.

7. The permittee shall submit semiannual reports if the following conditions are met:

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

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

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

9. The Hamilton County Department of Environmental Services determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the emissions unit.

10. The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report on site 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 recordkeeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit.

c. The Hamilton County Department of Environmental Services does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met:

i. The permittee notifies the Hamilton County Department of Environmental Services in writing of its intentions to make such a change. Hamilton County Department of Environmental Services may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emission 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 Hamilton County Department of Environmental Services 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.

ii. If monitoring data show that the emissions unit is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.

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.
   i. Any other information required by the test method.

   The test plan shall be made available to the Hamilton County Department of Environmental Services prior to testing, if requested. The results of tests conducted prior to December 1991, in

which Method 306A was used to demonstrate the performance of a control technique, are not acceptable.

2. The permittee shall use the following test methods to conduct an initial performance test:

   a. Method 306 or Method 306A, "Determination of Chromium Emissions From Decorative and Hard Chromium Electroplating and Anodizing Operations" shall be used to determine the chromium concentration from hard or decorative chromium electroplating tanks or chromium anodizing tanks.

      i. The sampling time and sample volume for each run of Methods 306 and 306A shall be at least 120 minutes and 1.7 dscm (60 dscf), respectively.

      ii. Methods 306 and 306A allow the measurement of either total chromium or hexavalent chromium emissions. Emissions units using chromic acid baths can demonstrate compliance with the emission limits by measuring either the total chromium or hexavalent chromium concentration. Hence, the hexavalent chromium concentration measured by these methods is equal to the total chromium concentration for the affected operations.

   b. The California Air Resources Board (CARB) Method 425 may be used to determine the chromium concentration from hard and decorative chromium electroplating tanks and chromium anodizing tanks if the following conditions are met:

      i. If a colorimetric analysis method is used, the sampling time and volume shall be sufficient to result in 33-66 micrograms of catch in the sampling train.

      ii. If an Atomic Absorption Graphite Furnace (AAGF) or Ion Chromatography (with a Post-column Reactor (ICPCR) analyses) is used, the sampling time and volume should be sufficient to result in a sample catch that is 5 to 10 times the minimum detection limit of the analytical method (i.e., 1.0 microgram per liter of sample for AAGF and 0.5 microgram per liter of sample for ICPCR).

      iii. A minimum of three separate runs must be conducted. The other requirements of §63.7 of 40 CFR Part 63, subpart A must also be met.

3. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected emissions unit are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. Specifications for differential pressure

measurement devices used to measure pressure drop across a control system shall be in accordance with the manufacturer's accuracy specifications.

4. The permittee shall measure the pressure drop across the add-on air pollution control device in accordance with the following guidelines:

   a. Pressure taps shall be installed at any of the following locations:

      i. At the inlet and outlet of the control system. The inlet tap should be installed in the ductwork just prior to the control device and the corresponding outlet pressure tap should be installed on the outlet side of the control device prior to the blower or on the downstream side of the blower.

      ii. On each side of the packed bed within the control system or on each side of each mesh pad within the control system.

      iii. On the front side of the first mesh pad and back side of the last mesh pad within the control system.

   b. Pressure taps shall be sited at locations that are:

      i. As free from pluggage as possible and away from any flow disturbances such as cyclonic demisters.

      ii. Situated such that no air infiltration at the measurement site will occur that could bias the measurement.

   c. Pressure taps shall be constructed of either polyethylene, polybutylene, or other nonreactive materials.

   d. Nonreactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop.

   e. Any of the following pressure gauges can be used to monitor pressure drop: a magnehelic gauge, an included manometer, or a "U" tube manometer.

   f. Prior to connecting any pressure lines to the pressure gauge(s), each gauge shall be zeroed. No calibration of the pressure gauges is required.

5. Compliance with the visible particulate emission limit in A.2. shall be determined in accordance with Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

occurrenceNEW SOURCE REVIEW FORM B

PTI Number: 14-04972 Facility ID: 1409010438

FACILITY NAME Intaglio Vivi Color Alliance Ltd

FACILITY DESCRIPTION Two Hard Chromium Electroplating Tanks CITY/TWP Middletown

Emissions Unit ID: **P003**

SIC CODE 3471 SCC CODE 3-09-01-006 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION Hard Chromium Electroplating Tank #1 with Composite Mesh Pad System

DATE INSTALLED January 1989

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.00025 lb/hr	0.0011	0.00025 lb/hr	0.0011
PM_{10}	Attainment	0.00025 lb/hr	0.0011	0.00025 lb/hr	0.0011
Sulfur Dioxide	Attainment				
Organic Compounds	Non-attainment				
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR Part 63 Subpart N PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
BAT is satisfied by the use of a composite mesh pad system and compliance with the MACT standards.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No - Subject to MACT.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

12070.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 14-04972 Facility ID: 1409010438

FACILITY NAME Intaglio Vivi Color Alliance Ltd

FACILITY DESCRIPTION Two Hard Chromium Electroplating Tanks CITY/TWP Middletown

Emissions Unit ID: **P003**

SIC CODE 3471 SCC CODE 3-09-01-006 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Hard Chromium Electroplating Tank #2 with Composite Mesh Pad System

DATE INSTALLED January 1989

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.0025 lb/hr	0.0011	0.0025 lb/hr	0.0011
PM_{10}	Attainment	0.0025 lb/hr	0.0011	0.0025 lb/hr	0.0011
Sulfur Dioxide	Attainment				
Organic Compounds	Non-attainment				
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR Part 63 Subpart N PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
BAT is satisfied by the use of a composite mesh pad system and compliance with the MACT standards.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No - Subject to MACT.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 14-04972 Facility ID: 1409010438

FACILITY NAME Intaglio Vivi Color Alliance Ltd

FACILITY DESCRIPTION Two Hard Chromium Electroplating Tanks CITY/TWP Middletown

Emissions Unit ID: **P003**

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000**c**.wpd	☒	☐
Modeling form/results	☐	0000000**s**.wpd	☐	☒
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☒
BAT Study	☐	0000000**b**.wpd	☐	☒
Other/misc.	☐	0000000**t**.wpd	☐	☒

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

14-04972

Intaglio Vivi-Color Alliance Ltd.
4014 Tytus Avenue
Middletown, OH 45042

Facility ID: 1409010438

Intaglio Vivi-Color Alliance Ltd. (IVA) installed 2 hard chrome electroplating tanks controlled with a composite mesh-pad system in January 1989 to replace an existing chrome plating tank. This permit to install covers the installation of these two emissions units (P002 and P003). IVA is an area source subject to 40 CFR Part 63 Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

The applicable regulations are 40 CFR Part 63 Subpart N, OAC rules 3745-31-05(A)(3) (BAT), 3745-17-07 and 3745-17-11.

BAT is satisfied by the use of composite mesh pad system and compliance with the provisions of 40 CFR Part 63 Subpart N - MACT standards. As the emissions units are subject to MACT standards, the Air Toxics Policy does not apply.

The emissions unit will be in compliance with all applicable regulations. A draft PTI should be issued for these emissions units.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04972 Facility ID: 1409010438

FACILITY NAME Intaglio Vivi Color Alliance Ltd

FACILITY DESCRIPTION Two Hard Chromium Electroplating Tanks CITY/TWP Middletown

Emissions Unit ID: **P003**

Permit Fee:	P002:	$200	(based on minimum PWR) Fee not doubled since installed prior to 1993.
	P003:	$200	(based on minimum PWR) Fee not doubled since installed prior to 1993.
	Total	$400	

Prepared by: Ajay Bahri

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS