



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02408

Fac ID: 1677011145

DATE: 5/31/2005

ChromeGods
William Hirschy
750 E Glenwood Ave
Akron, OH 44310

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 5/31/2005
Effective Date: 5/31/2005**

FINAL PERMIT TO INSTALL 16-02408

Application Number: 16-02408
Facility ID: 1677011145
Permit Fee: **\$200**
Name of Facility: ChromeGods
Person to Contact: William Hirschy
Address: 750 E Glenwood Ave
Akron, OH 44310

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

**750 E Glenwood Ave
Akron, Ohio**

Description of proposed emissions unit(s):

Decorative Chrome Plating.

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

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.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
Cr	0.825
PM	1.65

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Decorative Chrome Plating line - consisting of a prep tank, a chrome tank, a rectifier, anodes and fume suppression.	OAC rule 3745-31-05(A)(3)	0.004 lbs Cr/Hr 0.02 ton Cr/yr,
	OAC rule 3745-17-07(A)(1)(a)	5% opacity from any stack, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11(B)(1)	See 2.2b. below
	40 CFR 63, Subpart N	See 2.2b. below 0.01 mg Cr/dscm (4.4 x 10 ⁻⁶ gr/dscf)

2. Additional Terms and Conditions

- 2.a The mass particulate, and chromium emissions limitation have been calculated based on worst case conditions and operating parameters as presented in the permit to install application.
- 2.b The mass particulate emissions limitation required by OAC rule 3745-17-11(B)(1), and the visible emission limitation required by OAC rule 3745-17-07(A)(1)(a) are less stringent than the mass particulate emissions limitation, and the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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 (appropriate Ohio EPA District Office or local air agency) 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 regulating agency 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.

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- c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
- d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control 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 regulating agency 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 regulating agency.

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.
- j. 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 report, to the appropriate regulating agency, 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.
2. The permittee shall submit a Notification of Compliance Status to the appropriate regulating agency, 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;

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- b. 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;
 - c. 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;
 - d. the methods that shall be used to determine continuous compliance;
 - e. a description of the air pollution control method(s) used for each emission point;
 - f. a statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards; and
 - g. a statement by the owner or operator as to whether the emissions unit is in compliance.
3. The permittee shall prepare and submit annual compliance status reports (unless a more frequent reporting frequency has been determined) to the regulating agency 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. the report shall be completed annually and retained on site, and made available to the regulating agency upon request.

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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 regulating agency 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;

Emissions Unit ID: **P001**

- 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 accordance with the following requirements, in order to demonstrate compliance with the chromium emission limitation contained in this permit:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. One of the following test methods shall be employed to demonstrate compliance:
 - (1). 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 the electroplating or anodizing tank.
 - 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.
 - c. A minimum of three separate runs of the test method must be conducted in order to demonstrate compliance. All applicable requirements of §63.7 of 40 CFR Part 63, subpart A must also be met.
 - d. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA regulating agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the

emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

- e. Personnel from the regulating agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the regulating agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the regulating agency.

F. Miscellaneous Requirements

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.