State of Ohio Environmental Protection Agency

RE: PERMIT TO INSTALL DRAFT
MONTGOMERY COUNTY

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
P.O. Box 1049
Columbus, OH 43216-1049

Application No: 08-3973

DATE: April 7, 1999

Techmetals, Inc
Renee Gray
345 Springfield Street
Dayton, OH 45403

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, buy 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 Regional Air Pollution Control Agency

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

DRAFT OF PERMIT TO INSTALL 08-3973

Pe
T

Application Number:	08-3973
APS Premise Number:	0857043032
Permit Fee:	
Name of Facility:	Techmetals, Inc
Person to Contact:	Renee Gray
Address:	345 Springfield Street Dayton, OH 45403

Location of proposed air contaminant source(s) [emissions unit(s)]:
345 Springfield Street
Dayton, **OHIO**

Description of proposed emissions unit(s):
TWO HARD CHROME PLATING TANKS WITH EMISSION ELIMINATION DEVICES (EED'S), 140-CR2 AND 110-CR2.

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
Chromium	See Air Emission Summary

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
Hard chromium plating and parts cleaning with emission elimination device (EED), 140-CR2.	OAC rule 3745-31-05	Application of alternative control technology, emission elimination device (EED) See term 2.2.a.
	40 CFR Part 63 Subpart N	The limit specified by this rule is equivalent to that established by OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

   a. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) by conducting the qualitative test method approved in the USEPA letter of August 9, 1996. "Observed leaks in the EED shall be considered as indications of noncompliance with the Chrome plating NESHAP."

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 emission elimination devices (EEDs) 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 appropriate Ohio EPA District Office or local air agency, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emission unit. Based on this information, the appropriate Ohio EPA District Office or local air agency may require that the permittee make changes to the operation and maintenance plan if that plan:

   a. does not address a malfunction that has occurred;

   b. fails to provide for the operation of the 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 control 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 upon startup. The plan shall be incorporated by reference into the Title V permit, if and when a Title V permit is required, 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. work practice standards for the EEDs as outlined in the USEPA approval letter dated September 4, 1996, resulting from a submittal required under §63.342(f)(3)(C) and §63.343(d) of 40 CFR Part 63, Subpart N, for an air pollution control device not listed. These work practice standards shall include the following:

      i. drain the air-inlet (purge air) valves at the end of each day that the tanks are in operation;

      ii. perform weekly visual inspections of access door seals and membranes on the EED for integrity;

iii. drain the evacuation units, weekly, into the plating tank or into the rinse tanks (for recycle into the plating tank);

iv. perform monthly visual inspections of membranes for perforations using a light source that adequately illuminates the membrane (e.g., Grainger model No. 6X971 Fluorescent Hand Lamp);

v. perform monthly visual inspections of all clamps for proper operation and replace as needed;

vi. monthly cleaning or replacement of filters on evacuation unit;

vii. perform quarterly inspections of the evacuation unit and the piping to and from the unit to ensure that there are no leaks and no evidence of chemical attack; and,

viii. replace access door seals, membranes, evacuation unit filters, and purge air inlet check valves in accordance with manufacturer's recommendations.

c. procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;

d. a systematic procedure for identifying malfunctions of process equipment, EEDs, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions;

e. if the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs;

f. if actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the appropriate Ohio EPA District Office or local air agency;

g. the permittee shall keep the written operation and maintenance plan on record

after it is developed to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency for the life of the 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 appropriate Ohio EPA District Office or local air agency for a period of five years after each revision to the plan; and,

h. the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall follow the continuous compliance monitoring program as outlined in the USEPA approval letter of September 4, 1996 which includes the following:

a. beginning on the date of the initial performance test, Techmetals shall monitor and record the continued integrity of the EED seals and membranes. Compliance monitoring shall occur once each day that the affected source is operating using both of the following methods, unless no evacuation/ purge cycle is performed. The absence of the evacuation/ purge cycle shall be recorded and only the first method shall be used to determine compliance on that day.

i. When the electroplating tank is in operation and parts are being plated, induce an external pressure to the membrane, which should be bulged slightly upward due to the positive pressure existing inside the EED. This can be done by manually tapping the membrane downwards. By inducing external pressure on a segment of membrane, the balance of positive pressure is shifted to other part of the same membrane and/or to the other membrane(s). This should result in a movement at this and/or the other membrane(s) when the system is adequately sealed and the membrane(s) are intact. Absence of such movement or rebound of the membrane indicates lack of adequate seal or lack of membrane integrity.

ii. Presence of negative pressure on the membrane(s) during an evacuation/purge cycle (demonstrated by movement of the membrane toward the electroplating solution), shall be verified and logged daily. Absence of inward movement of the membrane(s) during evacuation indicates lack of adequate seal or lack of membrane integrity.

2. Operation of the affected source with the lack of adequate seals or membrane integrity shall constitute noncompliance with the standards.

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

4. 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; 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.

D. Reporting Requirements

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the appropriate Ohio EPA District Office or local air agency and shall be sent by U.S. mail, fax or by another courier.

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

date.

b. Submittals sent by other methods shall be received by the appropriate Ohio EPA District Office or local air agency on or before the specified date.

2. The permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report that contains the following information:

   a. the date when construction or reconstruction was commenced, no later than 30 calendar days after such date; and,

   b. the actual date of startup of the emissions unit within 30 calendar days after such date.

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 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 appropriate Ohio EPA District Office or local air agency ninety 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. the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit;

   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 will be used to determine continuous compliance;

   e. a description of the air pollution control technique 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.

5. The permittee shall report to the appropriate Ohio EPA District Office or local air agency 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 the appropriate Ohio EPA District Office or local air agency to document the ongoing compliance status of the emissions unit. This report shall include the following:

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

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

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

   d. a description of the type of process performed in the emissions unit;

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

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

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

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

   i. if the operation and maintenance plan required by this permit was not followed,

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

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

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

l. 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 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 appropriate Ohio EPA District Office or local air agency 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 record keeping and

monitoring requirements of 40 CFR Part 63, subpart A and this permit; and,

c. the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency in writing of its intentions to make such a change. The appropriate Ohio EPA District Office or local air agency may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping 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 appropriate Ohio EPA District Office or local air agency will notify the permittee in writing within 45 days after receiving notice. This notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted; and,

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.

11. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the appropriate Ohio EPA District Office or local air agency which includes the following:

a. the permittee's name, title, and address;

b. the address (i.e., physical location) or proposed address of the affected emissions unit if different from the permittee's;

c. a notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to

meet the criteria for a reconstruction as defined in 40 CFR Part 63.2;

d. an identification of 40 CFR Part 63, subpart N as the basis for the notification;

e. the expected commencement and completion dates of the construction or reconstruction;

f. the anticipated date of (initial) startup;

g. the type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing);

h. a description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity; and,

i. an estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR Part 63, subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.

E. Testing Requirements

1. The permittee shall use the approved qualitative test method stated in USEPA letter of August 9, 1996 to conduct an initial performance test.

2. The test plan shall be made available to the appropriate Ohio EPA District Office or local air agency prior to testing, if requested.

3. 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.

4. The results of the performance testing may be used to demonstrate compliance if:

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

b. the performance test was conducted under representative conditions;

c. the performance test report contains elements of paragraph E.3.a. through E.3.i; and,

d. the permittee has sufficient data to establish the operating parameter value that corresponds to compliance as required for continuous compliance monitoring.

F. Miscellaneous Requirements

None.

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

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
Hard chromium plating and parts cleaning with emission elimination device (EED), 110-CR2.	OAC rule 3745-31-05	Application of alternative control technology, emission elimination device (EED) See term 2.2.a.
	40 CFR Part 63 Subpart N	The limit specified by this rule is equivalent to that established by OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

a. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) by conducting the qualitative test method approved in the USEPA letter of August 9, 1996. "Observed leaks in the EED shall be considered as indications of noncompliance with the Chrome plating NESHAP."

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 emission elimination devices (EEDs) 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 appropriate Ohio EPA District Office or local air agency, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emission unit. Based on this information, the appropriate Ohio EPA District Office or local air agency may require that the permittee make changes to the operation and maintenance plan if that plan:

   a. does not address a malfunction that has occurred;

   b. fails to provide for the operation of the 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 control 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 upon startup. The plan shall be incorporated by reference into the Title V permit, if and when a Title V permit is required, 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. work practice standards for the EEDs as outlined in the USEPA approval letter dated September 4, 1996, resulting from a submittal required under §63.342(f)(3)(C) and §63.343(d) of 40 CFR Part 63, Subpart N, for an air pollution control device not listed. These work practice standards shall include the following:

      i. drain the air-inlet (purge air) valves at the end of each day that the tanks are in operation;

      ii. perform weekly visual inspections of access door seals and membranes on the EED for integrity;

      iii. drain the evacuation units, weekly, into the plating tank or into the

rinse tanks (for recycle into the plating tank);

iv. perform monthly visual inspections of membranes for perforations using a light source that adequately illuminates the membrane (e.g., Grainger model No. 6X971 Fluorescent Hand Lamp);

v. perform monthly visual inspections of all clamps for proper operation and replace as needed;

vi. monthly cleaning or replacement of filters on evacuation unit;

vii. perform quarterly inspections of the evacuation unit and the piping to and from the unit to ensure that there are no leaks and no evidence of chemical attack;

viii. replace access door seals, membranes, evacuation unit filters, and purge air inlet check valves in accordance with manufacturer's recommendations;

c. procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;

d. a systematic procedure for identifying malfunctions of process equipment, EEDs, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions;

e. if the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs;

f. if actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the appropriate Ohio EPA District Office or local air agency;

g. the permittee shall keep the written operation and maintenance plan on record

after it is developed to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency for the life of the 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 appropriate Ohio EPA District Office or local air agency for a period of five years after each revision to the plan; and,

h. the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall follow the continuous compliance monitoring program as outlined in the USEPA approval letter of September 4, 1996 which includes the following:

   a. beginning on the date of the initial performance test, Techmetals shall monitor and record the continued integrity of the EED seals and membranes. Compliance monitoring shall occur once each day that the affected source is operating using both of the following methods, unless no evacuation/ purge cycle is performed. The absence of the evacuation/ purge cycle shall be recorded and only the first method shall be used to determine compliance on that day.

      i. When the electroplating tank is in operation and parts are being plated, induce an external pressure to the membrane, which should be bulged slightly upward due to the positive pressure existing inside the EED. This can be done by manually tapping the membrane downwards. By inducing external pressure on a segment of membrane, the balance of positive pressure is shifted to other part of the same membrane and/or to the other membrane(s). This should result in a movement at this and/or the other membrane(s) when the system is adequately sealed and the membrane(s) are intact. Absence of such movement or rebound of the membrane indicates lack of adequate seal or lack of membrane integrity.

      ii. Presence of negative pressure on the membrane(s) during an evacuation/purge cycle (demonstrated by movement of the membrane toward the electroplating solution), shall be verified and logged daily. Absence of inward movement of the membrane(s) during evacuation indicates lack of adequate seal or lack of membrane integrity.

2. Operation of the affected source with the lack of adequate seals or membrane integrity shall constitute noncompliance with the standards.

3. The permittee shall fulfill all recordkeeping requirements in the General Provisions to

40 CFR Part 63, according to the applicability of subpart A.

4. 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; 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.

D. Reporting Requirements

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the appropriate Ohio EPA District Office or local air agency and shall be sent by U.S. mail, fax or by another courier.

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

   b. Submittals sent by other methods shall be received by the appropriate Ohio EPA District Office or local air agency on or before the specified date.

2. The permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report that contains the following information:

   a. the date when construction or reconstruction was commenced, no later than 30 calendar days after such date; and

   b. the actual date of startup of the emissions unit within 30 calendar days after such date.

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 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 appropriate Ohio EPA District Office or local air agency ninety 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. the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit;

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 will be used to determine continuous compliance;

e. a description of the air pollution control technique 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.

5. The permittee shall report to the appropriate Ohio EPA District Office or local air agency 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 the appropriate Ohio EPA District Office or local air agency to document the ongoing compliance status of the emissions unit. This report shall include the following:

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

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

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

d. a description of the type of process performed in the emissions unit;

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

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

g. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due

to process upsets, control equipment malfunctions, other known causes, and unknown causes;

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

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

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

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

l. 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 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 appropriate Ohio EPA District Office or local air agency 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 record keeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit;

c. the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency in writing of its intentions to make such a change. The appropriate Ohio EPA District Office or local air agency may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping 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 appropriate Ohio EPA District Office or local air agency will notify the permittee in writing within 45 days after receiving notice. This notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted; and,

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.

11. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the

appropriate Ohio EPA District Office or local air agency which includes the following:

a. the permittee's name, title, and address;

b. the address (i.e., physical location) or proposed address of the affected emissions unit if different from the permittee's;

c. a notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR Part 63.2;

d. an identification of 40 CFR Part 63, subpart N as the basis for the notification;

e. the expected commencement and completion dates of the construction or reconstruction;

f. the anticipated date of (initial) startup;

g. the type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing);

h. a description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity; and,

i. an estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR Part 63, subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.

E. Testing Requirements

1. The permittee shall use the approved qualitative test method stated in USEPA letter of August 9, 1996 to conduct an initial performance test.

2. The test plan shall be made available to the appropriate Ohio EPA District Office or local air agency prior to testing, if requested.

3. 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.

4. The results of the performance testing may be used to demonstrate compliance if:

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

b. the performance test was conducted under representative conditions;

c. the performance test report contains elements of paragraph E.3.a. through E.3.i.; and,

d. the permittee has sufficient data to establish the operating parameter value that corresponds to compliance as required for continuous compliance monitoring.

F. Miscellaneous Requirements

None.