



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY 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: 08-4084

DATE: October 6, 1999

Dayton Alloy Wheel LLC
Tadd Dieringer
1117 West Stewart Street
Dayton, OH 45408

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

Permit To Install

Issue Date: October 6, 1999

FINAL PERMIT TO INSTALL 08-4084

Application Number: 08-4084
APS Premise Number: 0857042084
Permit Fee: **\$800**
Name of Facility: Dayton Alloy Wheel LLC
Person to Contact: Tadd Dieringer
Address: 1117 West Stewart Street
Dayton, OH 45408

Location of proposed air contaminant source(s) [emissions unit(s)]:
1117 West Stewart Street
Dayton, Ohio

Description of proposed emissions unit(s):
**COPPER PLATING LINE (MOD), CHROME PLATING LINE (MOD), AND NITRIC ACID STRIP
OPERATION.**

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

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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

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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

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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>
Particulate	6.37

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>
Copper Plating Line with wet scrubber (**Modification)	OAC rule 3745-31-05(A)(3)	1.25 lbs/hr Particulate 5.48 TPY Particulate
		5% visible emission limitation as a 6 minute average
	OAC rule 3745-17-11	The particulate limit specified by this rule is less stringent than that established by OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07	The opacity limit specified by this rule is less stringent than that established by OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 1.25 lbs/hour particulate emission limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

- 1. The pressure drop across scrubber #1 shall be continuously maintained at a value of not less than 0.50 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate for scrubber #1 shall be continuously maintained at a value of not less than 1.60 gallons per minute at all times while the emissions unit is in operation.

2. The pressure drop across scrubber #2 shall be continuously maintained at a value of not less than 0.50 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate for scrubber #2 shall be continuously maintained at a value of not less than 0.25 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate for scrubber #1 while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on daily basis.
 - b. The scrubber water flow rate, in gallons per minute, on daily basis.
 - c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate for scrubber #2 while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on daily basis.
- b. The scrubber water flow rate, in gallons per minute, on daily basis.
- c. The operating times for the capture (collection) system, control device, monitoring

equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with general term and condition A.2. that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels for scrubber #1:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.
2. The permittee shall submit deviation (excursion) reports in accordance with general term and condition A.2. that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels for scrubber #2:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

E. Testing Requirements

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation

1.25 lbs/hr Particulate

Applicable Compliance Method-

The hourly allowable is based on maximum theoretical data provided by the facility. If required, compliance shall be determined by stack testing in accordance with OAC rule 3745-17-03(B)(10).
 - b. Emission Limitation-

5.48 TPY Particulate

Applicable Compliance Method-

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Emissions Unit ID: **P001**

Compliance is presumed through the use of the scrubbers. The emission limitation was developed by multiplying the maximum hourly allowable of 1.25 lbs/hr by the maximum operating schedule of 8760 hr/yr and dividing by 2000 lbs/ton.

c. Emission Limitation-

5% visible emission limitation as a 6 minute average

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

F. Miscellaneous Requirements

1. This modification represents a 5.36 TPY increase in emissions over that previously allowed in PTI #08-3560.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Decorative Chrome Plating Line (**Modification)	OAC rule 3745-31-05(A)(3) 40 CFR Part A and 63 Subpart N	See A.2.a See B.1- 4. The limit specified by this rule is equivalent to that established by OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall control chromium emissions discharged to the atmosphere by not allowing the surface tension of the electroplating or anodizing bath to exceed 45 dynes per centimeter (3.1×10^{-3} pound-force per foot) at any time during operation of the tank.

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 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:
 - i. does not address a malfunction that has occurred;
 - ii. 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
 - iii. 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 that includes the following elements:
 - i. 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.

C. Monitoring and/or Recordkeeping Requirements

1. a. During the initial performance test, the permittee shall determine the outlet chromium concentration using the procedures described in the "Testing Requirements" section of this permit to comply with the emission limitation through the use of a wetting agent-type or combination wetting agent-type/foam blanket fume suppressant. The permittee shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B of 40 CFR Part 63, Subpart N, setting the maximum value that corresponds to compliance with the applicable emission limitations. In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation.
- b. 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 the surface tension of the electroplating or anodizing bath. Operation of the affected emissions unit at a

surface tension greater than the value established during the performance test, or greater than 45 dynes/cm if the permittee is using this value as the maximum surface tension value, shall constitute noncompliance with the standards.

- c. The surface tension shall be monitored according to the following schedule:
 - i. The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Subpart N.
 - ii. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every four hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed is once every 40 hours of tank operation.
 - iii. Once an exceedance occurs, as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed. A subsequent decrease in frequency shall follow the schedule in paragraph (ii) above.
 - iv. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in paragraph (ii) above.
2. The permittee shall fulfill all Record keeping 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.
 - m. Records of the date and time that fume suppressants are added to the electroplating or anodizing bath.
4. All records shall be maintained for a period of five years.

D. Reporting Requirements

1. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.
2. 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.
3. 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 Regional Air Pollution Control 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.
 - 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.

4. 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 if an add-on air pollution control device is used.
 - 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.
5. If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to the appropriate Ohio EPA District Office or local air agency:
 - a. A brief description of the affected emissions unit and the components to be replaced.

- b. A brief description of the present and proposed emission control technique.
 - c. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new emissions unit.
 - d. The estimated life of the affected emissions unit after the replacements.
 - e. A discussion of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to the appropriate Ohio EPA District Office or local air agency satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.
6. 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.

E. Testing Requirements

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

F. Miscellaneous Requirements

- 1. This modification represents an update in the MACT standard terms and conditions for an existing area source.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Nitric Strip Operation with scrubber	OAC rule 3745-31-05(A)(3)	0.20 lb/hr Particulate 0.89 TPY Particulate (as Nitric Acid) 5% opacity as a six minute average
	OAC rule 3745-17-11	The particulate limit specified by this rule is less stringent than that established by OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07	The opacity limit specified by this rule is less stringent than that established by OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 0.20 lb/hour particulate emission limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than

0.50 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 0.70 gallons per minute at all times while the emissions unit is in operation.

2. The pH of the scrubber liquor shall be maintained within the range of 6-12.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on daily basis.
 - b. The scrubber water flow rate, in gallons per minute, on daily basis.
 - c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pH of the scrubber liquor, on daily basis.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with general term and condition A.2. that identify all periods of time during which the following scrubber parameters

were not maintained at or above the required levels:

- a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.
2. The permittee shall submit pH deviation (excursion) reports in accordance with general term and condition A.2. that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.

E. Testing Requirements

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

- a. Emission Limitation

0.20 lb/hr Particulate

Applicable Compliance Method-

The hourly allowable is based on maximum theoretical data provided by the facility. If required, compliance shall be determined by stack testing in accordance with OAC rule 3745-17-03(B)(10).

- b. Emission Limitation-

0.89 TPY Particulate

Applicable Compliance Method-

Compliance is presumed through the use of the scrubber. The emission limitation was developed by multiplying the maximum hourly allowable of 0.20 lbs/hr by the maximum operating schedule of 8760 hr/yr and dividing by 2000 lbs/ton.

- c. Emission Limitation-

5% visible emission limitation as a 6 minute average

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

F. Miscellaneous Requirements

None.