

Facility ID: 1667080035 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1667080035 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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 tank #2	OAC rule 3745-31-05 (PTI 16-1910)	1.89 x 10-3 lbs/hr chromium
		8.28 x 10-3 tpy chromium
		0.551 lbs/hr particulates 2.41 tpy particulates
		5% opacity as a 6-minute average
	OAC rule 3745-17-07	See A.2.b below.
	OAC rule 3745-17-11	See A.2.b below.
	40 CFR 63 subpart N	See A.2.a below.

2. Additional Terms and Conditions

- (a) The permittee shall control chromium emissions discharged to the atmosphere by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.01 mg/dscm (4.4 x 10-6 gr/dscf). The emissions limit based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.

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:
 - a. does not address a malfunction that has occurred;
 - b. fails to provide for the operation of the emission units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
 - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
4. The permittee shall prepare an operation and maintenance plan to be implemented no later than 1/25/96. The plan shall include the following elements:

- a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
 - b. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
 - c. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
 - d. 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.
 - e. 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.
 - f. 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.
 - g. 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 Record Keeping Requirements**
1. During the initial performance test, the permittee shall determine the outlet chromium concentration using the procedures as described in the "Testing Requirements" section of this permit when complying with the emission limitations through the use of a foam blanket in the electroplating or anodizing bath. The permittee shall establish as the site-specific operating parameter the thickness of the foam blanket, setting the minimum thickness that corresponds to compliance with the applicable emission limitation. In lieu of establishing the minimum foam blanket thickness during the performance test, the permittee may accept 2.54 centimeters (1 inch) as the minimum foam blanket thickness that corresponds to compliance with the applicable emission limitation. All foam blanket measurements must be taken in close proximity to the workpiece or cathode area in the plating tank.
 2. On and after the date on which the initial performance test is required to be completed under section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor the foam blanket thickness of the electroplating or anodizing bath. Operation of the affected emissions unit at a foam thickness less than the value established during the initial performance test, or less than 2.54 cm if the permittee is using this value, shall constitute noncompliance.
 3. The foam blanket thickness shall be measured according to the following schedule:
 - a. The foam blanket thickness shall be measured once every 1 hour of tank operation.
 - b. The time between monitoring can be increased if there have been no exceedances. The foam blanket thickness shall be measured once every hour of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedance for 40 hours of tank operation, foam blanket thickness measurement may be conducted once every 4 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, foam blanket thickness measurement may be conducted once every 8 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency allowed is once per 8 hours of tank operation.
 - c. Once an exceedance occurs through foam blanket thickness monitoring, the original monitoring schedule of once every hour shall be resumed. A subsequent decrease in frequency shall follow the schedule in paragraph (ii) above.
 - d. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every hour must be resumed, with a decrease in monitoring frequency allowed following the procedure in paragraph (ii) above.
 4. The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.
 5. 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 section 63.9 and section 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.
 - n. Records of the bath components purchased, with the wetting agent clearly identified as a bath constituent contained in one of the components.
6. All records shall be maintained for a period of five years.
- D. Reporting Requirements**
- 1. The permittee shall fulfill all reporting requirement as outlined in 40 CFR part 63 subpart A. These reports shall be made to the 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 no later than July 24, 1995 that contains the following information:
 - a. The name, title, and address of the owner or operator;
 - b. The address (i.e., physical location) of the emissions unit;
 - c. Identification of the applicable emission limitations and compliance date.
 - d. A statement of whether the affected emissions unit is located at a major source or at an area source.
 - e. A brief description of each affected emission unit, including the type of process operation performed.
 - 3. The permittee shall submit a Notification of Compliance Status to the appropriate Ohio EPA District Office or local air agency no later than February 24, 1996, 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 there were used to determine compliance with this limitation.
 - b. If a performance test is required, the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit, including measurements and calculations to support special compliance provisions for multiple emissions units controlled by a common add-on air pollution control device.
 - c. The type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm or mg/hr if the emissions unit is using the special provisions for multiple emissions units controlled by a common add-on air pollution control device. (For emissions units not required to conduct a performance test, the surface tension measurement may fulfill this requirement.)
 - d. For each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit.
 - e. The methods that will be used to determine continuous compliance.
 - f. A description of the air pollution control technique used for each emission point.
 - g. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards.
 - h. A statement by the owner or operator as to whether the emissions unit is in compliance.
 - i. Records to support that the facility is small no later than February 24, 1996.

4. 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.
5. 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. The beginning and ending dates of the reporting period.
 - e. The total operating time of the emissions unit during the reporting period.
 - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
 - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
 - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
 - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.
 - i. A description of any changes in monitoring, processes, or controls since the last reporting period.
 - j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
 - k. The date of the report.
 - m. The report shall be completed annually and retained on site, and made available to the local air agency or district office upon request.
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.
7. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.
8. 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.
9. 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 local air agency or district office 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.

10. The permittee shall submit the following reports:

- a. An initial notification shall be submitted no later than July 24, 1995 which includes:
 - i. The name, title, and address of the owner or operator.
 - ii. The address (i.e., physical location).
 - iii. Identification of the applicable emission limitations and compliance date.
 - iv. A brief description, including the type of process operation performed.
 - v. A statement that a trivalent chromium process that incorporates a wetting agent is being employed.
 - vi. The list of bath components that comprise the trivalent chromium bath, with the wetting agent clearly defined.
- b. Within 30 days of the compliance date, a notification of compliance status that contains an update of the information submitted in the initial notification report or a statement that the information is still accurate.
- c. Within 30 days of a change to the trivalent chromium electroplating process, a report that includes:
 - i. A description of the manner in which the process has been changed and the emission limitation, if any, now applicable to the affected emissions unit.
 - ii. If a different emission limitation applies, then the application information required in the initial notification report.
 - iii. The notification and reporting requirements of paragraphs (d), (e), (f), (g), and (h) of section 63.347 of 40 CFR Part 63, subpart N.

E. Testing Requirements

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

Emission Limitation:

1.89 x 10⁻³ lbs/hr chromium
8.28 x 10⁻³ tpy chromium

Applicable Compliance Method:

Multiply the AP-42 emission factor (Table 12.20-1, Fifth Edition (7/96)) of 1.2 x 10⁻⁶ grains /dscf by the maximum outlet vent flow per hour and convert the result to pounds.

Emission Limitation:

0.551 lbs/hr particulates
2.41 tpy particulates

Applicable Compliance Method:

Multiply the AP-42 emission factor (Table 12.20-1, Fifth Edition (7/96)) of 2.5 x 10⁻⁶ grains /dscf by the maximum outlet vent flow per hour and convert the result to pounds.

Emission Limitation:

5% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements

1. None