

Facility ID: 1677010072 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: 1677010072 Emissions Unit ID: P002 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>
Three hard chrome electroplating tanks with a mist eliminator	OAC rule 3745-31-05, and see F.1 below	See A.2.a below
	40 CFR Part 63, Subpart N, and see F.1 below	See A.2.b below
	OAC rule 3745-17-11	See A.2.c below
	OAC rule 3745-17-07	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- (a) The permittee of this emissions unit shall not cause or permit the particulate matter emissions to exceed 0.10 pound per hour. During tank operation each owner or operator of an existing, new or reconstructed affected emissions unit shall control chromium emissions discharged to the atmosphere from that affected emissions unit by not allowing the concentration of total chromium in the exhaust gas to exceed 0.03 mg/dscm (1.3x10<sup>-5</sup> gr/dscf) per tank. The particulate matter emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation as determined using best available technology. The permittee shall comply with all applicable sections of 40 CFR Part 63, Subpart N.

**B. Operational Restrictions**

1. The permittee shall prepare an operation and maintenance plan (O&M) to be implemented no later than the compliance date. The plan shall include the following elements:
  - a. the O&M 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; and
  - b. the O&M shall shall incorporate the following work practice standards:
    - i. Visually inspect at least once per quarter the fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the device(s).
    - ii. Visually inspect at least once per quarter the ductwork from the tank or tanks to the control device to ensure there are no leaks.
    - iii. Perform washdown of the fiber elements in accordance with the manufacturer's recommendations.
2. At all times, including periods of startup, shutdown, and malfunction, the affected emissions unit must be operated and maintained consistent with the O&M required under these terms and conditions. The affected emissions unit include associated air pollution control devices and monitoring equipment.
3. Malfunctions shall be corrected as soon as practicable and in accordance with the O&M.
4. If found to be deficient, the O&M shall be revised to the satisfaction of the Akron Regional Air Quality

Management District (ARAQMD). The O&M shall also be revised if it fails to adequately address a malfunction event within 45 days of its occurrence. If the actions taken during the periods of malfunction were not those specified in the O&M, the permittee shall record the alternate actions taken and report them to the Administrator and ARAQMD within 2 working days after commencing these actions. The 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 ARAQMD.

5. Pressure drop across the filter-bed mist eliminator shall be maintained in a range of 2.2 inches plus or minus 1.0 inch of water column whenever the emissions unit is in operation. Pressure drop across the mist eliminator and capture hood shall be maintained in a range of 5.6 inches plus or minus 1.0 inch of water column whenever the emissions unit is in operation. These site-specific ranges were established during the July 2, 1997, initial performance test. The permittee may conduct additional performance tests to establish a range of compliant pressure drop values.
6. The standards that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.

**C. Monitoring and/or Record Keeping Requirements**

1. This facility shall fulfill all applicable recordkeeping requirements of 40 CFR Part 63, Subpart A.
2. 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 emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and sections 63.9 and 63.10 of 40 CFR Part 63, subpart A.
3. The O&M shall be retained on site and be made available to the Director (appropriate District Office or local air agency) during the life of the affected emissions unit or until the unit is no longer subject to this rule. If the O&M is revised, the superseded versions shall be maintained for inspection for 5 years following each revision to the plan.
4. All records shall be maintained for a period of 5 years.

**D. Reporting Requirements**

1. This facility shall comply with all applicable reporting requirements of 40 CFR Part 63, Subpart A. These reports shall be made to the ARAQMD.
2. The permittee shall submit a Notification of Compliance Status to the appropriate Ohio EPA District Office or local air agency, 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 the affected emissions unit:
  - a. The applicable emissions limitations and the methods that were used to determine compliance with this limitation.
  - b. If a performance test is required, the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit, including measurements and calculations to support special compliance provisions for multiple emissions units controlled by a common add-on air pollution control device.
  - c. The type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm or mg/hr if the emissions unit is using the special provisions for an emissions unit with multiple emission points 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.
3. 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.
4. 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 O&M for the emissions unit.
  - h. If the O&M 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.
5. The permittee shall submit semiannual ongoing compliance status reports, until a request to reduce reporting frequency is approved, if either of following conditions are met:
- a. the permittee reports an exceedance; or
  - b. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period, and 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. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
- Emission Limitation -  
0.10 lb/hr particulate matter
- Applicable Compliance Method -  
If required, compliance shall be demonstrated through testing performed in accordance with method 5 of 40 CFR 60, Appendix A, and the procedures specified in OAC rule 3745-17-03.
- Emission Limitation -  
0.03 mg/dscm total chromium compounds
- Applicable Compliance Method -  
Within 6 months prior to permit expiration, compliance shall be demonstrated through testing performed in accordance with method 306 or 306A of 40 CFR 63, Appendix A. Sample time and sample volume for each run of methods 306 and 306A shall be at least 120 minutes and 60 dscf, respectively.
- Emission Limitation -
- Applicable Compliance Method -  
If required, compliance shall be demonstrated through visible emissions observations performed in accordance with method 9 of 40 CFR 60, Appendix A, and the procedures specified in OAC rule 3745-17-03.  
Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in

the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emissions tests shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

The test(s) shall be conducted under maximum production rates unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

2. Special Compliance Provisions:

a. This facility has conducted, on July 2, 1997, an initial performance test as required under 40 CFR 63.7, using the procedures and methods listed in 40 CFR 63.7, and 40 CFR 63.344.

b. This facility shall demonstrate continuous compliance with its emission limits by conducting monitoring according to the type of air pollution control technique used. This facility shall comply with requirements of section 63.343(c)(4) of subpart N when using a mist eliminator.

c. Performance test results shall be documented in reports containing the information required in 40 CFR 63.344(a)(1) through (a)(9). If requested, the test plan shall be made available to the Administrator and ARAQMD prior to testing.

d. This facility shall observe the special provisions of 40 CFR 63.344(e), when determining compliance.

F. **Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1611, as issued on March 26, 1997: A, B, C, D, E, and F.