

Facility ID: 1677010109 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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.

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Facility ID: 1677010109 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>
existing 1000 gallon hard-chrome electroplating tank controlled by a composite mesh-pad system and a fiber-bed mist eliminator	40 CFR Part 63, Subpart N  OAC rule 3745-17-07 OAC rule 3745-17-11	During tank operation the permittee of an existing 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.  See A.2.a below. See A.2.b below. 0.551 lb/hr of particulates

**2. Additional Terms and Conditions**

- (a) The permittee shall comply with all applicable sections of 40 CFR Part 63, Subpart N. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

**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 emissions unit, the add-on air pollution control devices (if such devices are 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 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 associated with the control device to ensure there are no leaks;
    - iii. perform washdown of the fiber elements in accordance with the manufacturer's recommendations;
    - iv. visually inspect at least once per quarter the composite mesh-pad device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;
    - v. visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist;
    - vi. visually inspect at least once per quarter the ductwork from the tank to the control device to ensure there are no leaks; and



- 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 O&M, as required by the work practice standards; and
    - h. a statement by the permittee 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; and
    - 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 the 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(s) and monitoring equipment is 5 percent or greater of the total operating time.
- E. Testing Requirements**
- 1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
0.551 lb/hr of particulates  
  
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:  
20% opacity as a 6-minute average

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.

Emission Limitation:

0.03 mg/dscm of total chromium compounds

Applicable Compliance Method:

The permittee shall demonstrate continuous compliance with the above emission limitation by conducting monitoring according to the type of air pollution control technique(s) used. The permittee shall comply with the requirements of: 40 CFR 63.343(c)(1) of Subpart N when using a composite mesh-pad system; and 40 CFR 63.343(c)(4) of Subpart N when using a fiber-bed mist eliminator.

2. Special Compliance Provisions:

Performance tests shall be conducted in accordance with the methods and procedures specified in 40 CFR 63.344 of Subpart N and in 40 CFR 63.7 of Subpart A. Test results shall be documented in reports containing the information required in 40 CFR 63.344(a)(1) through (a)(9).

Note:

The permittee conducted an initial performance test on July 2, 1997 as required under 40 CFR 63.7, and presents certification that the test data was gathered and recorded in accordance with the requirements of Method 306A as outlined in 40 CFR 63.344.

F. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010109 Emissions Unit ID: P003 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>
existing 720 gallon decorative chrome electroplating tank controlled by a fiber-bed mist eliminator	40 CFR Part 63, Subpart N	During tank operation the permittee of an existing 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 0.01 mg/dscm (4.4x10 <sup>-6</sup> gr/dscf) per tank.
	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-11	See A.2.b below. 0.551 lb/hr of particulates

2. **Additional Terms and Conditions**

- (a) The permittee shall comply with all applicable sections of 40 CFR Part 63, Subpart N. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

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 emissions unit, the add-on air pollution control devices (if such devices are 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 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 to the control device to ensure there are no leaks; and
    - 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 includes 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 fiber-bed mist eliminator shall be maintained in a range of 0.42 inch plus or minus 0.20 inch of water column whenever the emissions unit is in operation. This site-specific range was established during the August 15, 1997 initial performance test, which demonstrated the emissions unit at that time to be in compliance with the applicable emissions limitation for total chromium compounds. 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.
  7. The permittee shall operate the mist eliminator while this emissions unit is in operation.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee 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 devices, if such devices are 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 devices inspected, the date of inspection, a brief description of the working condition of the devices 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 devices, and monitoring equipment including the frequency of fiber elements cleaning and replacement;
    - c. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control devices, and monitoring equipment;
    - d. records of actions taken during periods of malfunction when such actions are inconsistent with the O&M;
    - e. other records, which may take the form of checklists, necessary to demonstrate consistence with the provisions of the O&M;
    - 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 devices, 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 devices, or monitoring equipment;
    - k. the total process operating time of the emissions unit during the reporting period; and
    - l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and 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.

**D. Reporting Requirements**

1. The permittee 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 O&M, as required by the work practice standards; and
  - h. a statement by the permittee 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; and
  - 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 the 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(s) and monitoring equipment is 5 percent or greater of the total operating time.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

## Emission Limitation:

0.551 lb/hr of particulates

## 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:

20% opacity as a 6-minute average, from any stack

## 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.

## Emission Limitation:

0.01 mg/dscm of total chromium compounds

## Applicable Compliance Method:

The permittee shall demonstrate continuous compliance with the above emission limitation by conducting monitoring according to the type of air pollution control technique(s) used. The permittee shall comply with the requirements of 40 CFR 63.343(c)(4) of Subpart N when using a fiber-bed mist eliminator.

## 2. Special Compliance Provisions:

Performance tests shall be conducted in accordance with the methods and procedures specified in 40 CFR 63.344 of Subpart N and in 40 CFR 63.7 of Subpart A. Test results shall be documented in reports containing the information required in 40 CFR 63.344(a)(1) through (a)(9).

## Note:

The permittee conducted an initial performance test on August 15, 1997 as required under 40 CFR 63.7, and presents certification that the test data was gathered and recorded in accordance with the requirements of Method 306A as outlined in 40 CFR 63.344.

F. **Miscellaneous Requirements**

1. None