Facility ID: 1677130055 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.

Go to Part II for Emissions Unit P001
Go to Part II for Emissions Unit P002

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

Facility ID: 1677130055 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
hard chrome plating tank T5 (C5)	40 CFR Part 63, Subpart N (PTI 16-758)	See A.2.a below.
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-17-07	See A.2.c below.

2. **Additional Terms and Conditions**

   (a) The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.03mg/dscm.
   The requirements of OAC rule 3745-17-11 are less stringent than the requirements 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 the rule.

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 occurance 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 January 25, 1997. The plan shall be incorporated by reference into the Title V permit and include the following elements:

   a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.

b. The O/M plan shall incorporate the following work practice standards:

i. Visually inspect the device at least once per quarter 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.

ii. 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.

iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.

iv. Perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.

c. 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.

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

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

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency for the life of the emission unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency for a period of five years after each revision to the plan.

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

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

1. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.

2. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept +/-1 inch of water column from this value as the compliant range.

3. 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 and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating. To be in compliance, the composite mesh-pad system shall be operated within +/-1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

4. The permittee shall fulfill all recordkeeping 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; and

m. records of the actual cumulative rectifier capacity of hard chromium electroplating tanks expended during each month of the reporting period, and the total capacity expended to date for a reporting period.

D. **Reporting Requirements**

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

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

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

2. The permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report 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;

   f. the maximum potential cumulative potential rectifier capacity;

   g. a statement of whether the emissions unit is located at a small or a large, hard chromium facility and whether this will be demonstrated through actual or maximum potential cumulative rectifier capacity; and

   h. a statement of whether the permittee will limit the maximum potential cumulative rectifier capacity such that the hard chromium electroplating facility is considered small.

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 testing 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 permittee as to whether the emissions unit is in compliance; and

   i. records to support that the facility is an area (non-major) source.

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;

   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;

   l. the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis; and

   m. the report shall be completed annually and retained on site, and made available to the Akron Regional Air Quality Management District 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 recordkeeping and monitoring requirements of 40 CFR Part 63, Subpart A and this permit; and
   c. The appropriate Ohio EPA District Office or local air agency does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met:

   i. The permittee notifies the appropriate Ohio EPA District Office or local air agency in writing of its intentions to make such a change. The [local air agency or district office] may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping 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.

E. **Testing Requirements**

1. Performance test results shall be documented in complete test reports that contain the following information:

   a. a brief process description;

   b. sampling location description(s);

   c. a description of sampling and analytical procedures and any modifications to standard procedures;

   d. test results;

   e. quality assurance procedures and results;

   f. records of operating conditions during testing, preparation of standards, and calibration procedures;

   g. raw data sheets for field sampling and field and laboratory analyses;

   h. documentation of calculations; and

   i. any other information required by the test method.

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

3. The results of tests conducted prior to December 1991, in which Method 306A was used to demonstrate the performance of a control technique, are not acceptable.

4. If the permittee conducts performance testing at startup to obtain a permit to install, the results of such testing may be used to demonstrate compliance if:

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

   b. the performance test was conducted under representative operating conditions;

   c. the performance test report contains the elements of sections E.1.a through E.1.i; and

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

   Note:

   The permittee conducted an initial performance test as a baseline study. This study, which is part of the Environmental Protection Agency's (EPA) Common Sense Initiative (CSI), was conducted to assist the electroplating industry in meeting Maximum Achievable Control Technology (MACT) standards established by the EPA that became effective in January 1997. This project was the first phase of a three-phase study in which baseline operating and emissions information was gathered at five selected hard chromium electroplating facilities. Sampling and analysis was conducted for total and hexavalent chromium at the sources from October 16 through 26, 1995. Sampling and analysis of gas upstream and downstream of the facility's control device was performed using EPA Methods 306 or 306A. Fugitive bath samples were collected and analyzed by OSHA Method 125G and various process data were collected.

5. 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 in accordance with the requirements of 40 CFR 63.343(c)(1) of Subpart N.

6. 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.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 1677130055 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
hard chrome plating tank T3 (C3)	40 CFR Part 63, Subpart N (PTI 16-758)	See A.2.a below.
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-17-07	See A.2.c below.

2. **Additional Terms and Conditions**

(a) The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.03mg/dscm.
The requirements of OAC rule 3745-17-11 are less stringent than the requirements 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 the rule.

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 occurance 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 January 25, 1997. The plan shall be incorporated by reference into the Title V permit and include the following elements:

a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.

b. The O/M plan shall incorporate the following work practice standards:

i. Visually inspect the device at least once per quarter 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.

ii. 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.

iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.

iv. Perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.

c. 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.

d. 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.

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

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

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency for the life of the emission unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency for a period of five years after each revision to the plan.

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

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

1. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.

2. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept +/-1 inch of water column from this value as the compliant range.

3. 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 and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating. To be in compliance, the composite mesh-pad system shall be operated within +/-1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

4. The permittee shall fulfill all recordkeeping 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; and

m. records of the actual cumulative rectifier capacity of hard chromium electroplating tanks expended during each month of the reporting period, and the total capacity expended to date for a reporting period.

D. **Reporting Requirements**

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63, Subpart A. These reports shall

be made to the appropriate Ohio EPA District Office or local air agency and shall be sent by U.S. mail, fax or by another courier.

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

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

2. The permittee shall submit to the appropriate Ohio EPA District Office or local air agency an initial notification report 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;

f. the maximum potential cumulative potential rectifier capacity;

g. a statement of whether the emissions unit is located at a small or a large, hard chromium facility and whether this will be demonstrated through actual or maximum potential cumulative rectifier capacity; and

h. a statement of whether the permittee will limit the maximum potential cumulative rectifier capacity such that the hard chromium electroplating facility is considered small.

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 testing 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 permittee as to whether the emissions unit is in compliance; and

i. records to support that the facility is an area (non-major) source.

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;

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;

l. the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis; and

m. the report shall be completed annually and retained on site, and made available to the Akron Regional Air Quality Management District 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 recordkeeping and monitoring requirements of 40 CFR Part 63, Subpart A and this permit; and
c. The appropriate Ohio EPA District Office or local air agency does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met:

i. The permittee notifies the appropriate Ohio EPA District Office or local air agency in writing of its intentions to make such a change. The [local air agency or district office] may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping 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.

E. **Testing Requirements**

1. Performance test results shall be documented in complete test reports that contain the following information:

a. a brief process description;

b. sampling location description(s);

c. a description of sampling and analytical procedures and any modifications to standard procedures;

d. test results;

e. quality assurance procedures and results;

f. records of operating conditions during testing, preparation of standards, and calibration procedures;

g. raw data sheets for field sampling and field and laboratory analyses;

h. documentation of calculations; and

i. any other information required by the test method.

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

3. The results of tests conducted prior to December 1991, in which Method 306A was used to demonstrate the performance of a control technique, are not acceptable.

4. If the permittee conducts performance testing at startup to obtain a permit to install, the results of such testing may be used to demonstrate compliance if:

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

   b. the performance test was conducted under representative operating conditions;

   c. the performance test report contains the elements of sections E.1.a through E.1.i; and

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

   Note:

   The permittee conducted an initial performance test as a baseline study. This study, which is part of the Environmental Protection Agency's (EPA) Common Sense Initiative (CSI), was conducted to assist the electroplating industry in meeting Maximum Achievable Control Technology (MACT) standards established by the EPA that became effective in January 1997. This project was the first phase of a three-phase study in which baseline operating and emissions information was gathered at five selected hard chromium electroplating facilities. Sampling and analysis was conducted for total and hexavalent chromium at the sources from October 16 through 26, 1995. Sampling and analysis of gas upstream and downstream of the facility's control device was performed using EPA Methods 306 or 306A. Fugitive bath samples were collected and analyzed by OSHA Method 125G and various process data were collected.

5. 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 in accordance with the requirements of 40 CFR 63.343(c)(1) of Subpart N.

6. 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.

F. **Miscellaneous Requirements**

1. None