Facility ID: 0125042160 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: 0125042160 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Chrome plating operation	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity at the stack as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	See A.2.a. below.
	OAC rule 3745-31-05, and see F.1.	.031 lb particulate emission/hr .14 ton particulate emissions/yr .00018 ton chrome/yr
	40 CFR 63 Subpart N, and see F.1.	The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed .03 mg/dscm.

2. **Additional Terms and Conditions**

   (a) The limit established by BAT is more stringent than the limit established by OAC rule 3745-17-11(B)(1).

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 occurence 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 Ohio EPA, Central District Office, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the Ohio EPA, Central District Office 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 emissions 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 implement the approved operation and maintenance plan which includes the following elements:

   a. The operation and maintenance criteria for the affected emissions unit, the 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 operation and maintenace 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, air pollution control devices, and process and control system monitoring equipment, and the procedures 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 Ohio EPA, Central District Office.

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 Ohio EPA, Central District Office for the life of the emissions 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 Ohio EPA, Central District Office for a period of 5 years after each revision of 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.

i. To be in compliance, the composite mesh-pad system shall be operated within a pressure drop range of .2 to 2.2 inches of water. This range is based upon the pressure drop observed during the August 2, 1996 emission test.

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

1. On and after the date on which the initial performance test is required to be completed under ?63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor 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.

2. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A.

3. The permittee also shall maintain the following records:

a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.

b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.

c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.

d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.

e. Other records, which may take the form of checklists, necessary to demonstrate consistence with the provisions of the operation and maintenance plan.

f. Test reports documenting results of all performance tests.

g. All measurements as may be necessary to determine the conditions of performance tests.

h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.

i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.
j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of

the process, add-on air pollution control device, or monitoring equipment.

k. The total process operating time of the 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.

D. **Reporting Requirements**

1. The permittee shall fullfill all reporting requirement as outlined in 40 CFR Part 63, Subpart A. These reports shall be made to the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office on or before the specified date.

2. The permittee shall prepare an ongoing compliance status report annually 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.

3. 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.

4. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.

5. The Ohio EPA, Central District Office 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.

6. 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.

c. The Ohio EPA, Central District Office 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 Ohio EPA, Central District Office in writing of its intentions to make such a change. The Ohio EPA, Central 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 Ohio EPA, Central District Office 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. Compliance with the emissions limitation(s) in Section A.1 of these Special Terms and Conditions shall be determined in accordance with the following requirements:
Emission Limitation: .03 mg total chrome/dscm

Applicable Compliance Method: Emissions testing employing method 306.
Emission limitation- Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

Compliance shall be demonstrated by the method specified in OAC rule 3745-17-03(B)(1).
Emission Limitation: .031 pound of particulate emissions/hour.

Applicable Compliance Method: Emissions testing employing 40 CFR Part 60, Appendix A, methods 1-5.

F. **Miscellaneous Requirements**

1. These terms and conditions shall supersede all of the air pollution control requirements contained in permit to install 01-4490 issued for this emissions unit on December 7, 1994 and modified on June 15, 1995 and October 9, 1996.

2. All chromium electroplating facilities have a 5 year deferrment from Title V starting October 1995 (the date the U.S. EPA approved Ohio's Title V program). Unless the chromium electroplating tank is either: (1) a decorative chromium electroplating operation or a chromium anodizing operations that uses a fume suppressant as an emission reduction technology, or (2) a decorative chromium electroplating operation that uses a trivalent chromium bath that incorporates a wetting agent as a bath ingredient, the permittee will need to file a Title V application even if they are not a major source.