



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/16/2010

MIKE WITTMAN
AMERICAN TRIM LLC, PRODUCT CENTER 3
1501 MICHIGAN ST
SIDNEY, OH 45365

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0306020054
Permit Number: P0106097
Permit Type: Initial Installation
County: Auglaize

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN TRIM LLC, PRODUCT CENTER 3**

Facility ID: 0306020054
Permit Number: P0106097
Permit Type: Initial Installation
Issued: 9/16/2010
Effective: 9/16/2010
Expiration: 9/14/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN TRIM LLC, PRODUCT CENTER 3

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Authorization

Facility ID: 0306020054
Application Number(s): A0039196
Permit Number: P0106097
Permit Description: Switch - from tri-valent (decorative chromium) plating to hexa-valent plating
Permit Type: Initial Installation
Permit Fee: \$0.00
Issue Date: 9/16/2010
Effective Date: 9/16/2010
Expiration Date: 9/14/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AMERICAN TRIM LLC, PRODUCT CENTER 3
217 KREIN AVE.
WAPAKONETA, OH 45895

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Chris Korleski
Director



Authorization (continued)

Permit Number: P0106097

Permit Description: Switch - from tri-valent (decorative chromium) plating to hexa-valent plating

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P017
Company Equipment ID:	Tank #17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a



timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.



If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

C. Emissions Unit Terms and Conditions



1. P017, chrome plating tank

Operations, Property and/or Equipment Description:

hexavalent chromium passivation tank (decorative electroplating) (Tank no. 17) with fume suppressant containing a wetting agent

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	25.9 pound particulate matter 10 microns or less (PM ₁₀) per year 12.4 pound chromium (Cr) compounds per year See b)(2)a, b)(2)c, and b)(2)d.
OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
40 CFR, Part 63, Subpart N (40 CFR 63.340 – 60.348)	See b)(2)e.
40 CFR 63.1 – 15	Table 1 of Subpart N of 40 CFR Part 63 – Applicability of General Provisions to Subpart N shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
OAC rule 3745-17-11(B)	None. [See b)(2)f.]
OAC rule 3745-17-07(A)	None. [See b)(2)g.]

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/controls measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate matter 10 microns or less in size (PM₁₀), or to chromium (Cr) compounds from these air contaminant sources since the uncontrolled potential to emit for emissions of PM₁₀ and Cr is each less than 10 tons per year.
- c. This permit for this emissions unit P017 (operation as a hexavalent bath) provides for one 'alternative operating scenario' for this bath. Permit P0106768 for emissions unit P015 contains the provisions for the other operating scenario (operation as a trivalent bath).
- d. The requirements of this rule also include compliance with the requirements of 40 CFR 63 Subpart N.
- e. The permittee, using a chemical fume suppressant containing a wetting agent, shall not allow the surface tension of the decorative chromium electroplating or anodizing bath(s), emissions unit P016, to exceed 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter (2.4×10^{-3} pound-force/foot) as measured by a tensiometer at any time during tank operation. This limitation also applies during startup and shutdown operations, but not during periods of malfunction where work practice standards address and correct any malfunction event.
[40 CFR 63.342(d)(2) and (b)(1)]
- f. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.
- g. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

h. The annual Cr and PM₁₀ emission limitations represent the potential to emit for each pollutant for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) **Operational Restrictions**

(1) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain this emissions unit, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by these terms and conditions.

[40 CFR 63.342(f)(1)(i) and (f)(3)]

(2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

[40 CFR 63.342(f)(1)(ii) and (f)(3)]

(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 emissions 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 emissions unit, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or

c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

[40 CFR 63.342(f)(2)]

(4) The permittee shall prepare an Operation and Maintenance Plan (O&M Plan) to be implemented no later than the compliance date. The plan shall include the following elements:

a. the O&M Plan shall specify the operation and maintenance criteria for this emissions unit, the add-on air pollution control device (if applicable), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;

b. the O&M Plan shall incorporate the work practice standards for the add-on air pollution control device and monitoring equipment required to demonstrate compliance with the standard.

- c. the O&M 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; and
 - d. the O&M 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. the O&M Plan shall include the manufacturer's recommendations for any monitoring equipment, e.g. any stalagmometer (See Table 1 of 40 CFR 63.342).
[40 CFR 63.342(f)(3)(i)]
- (5) If the O&M 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. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.
[40 CFR 63.342(f)(3)(ii)]
- (6) The permittee shall keep the written O&M Plan on record after it is developed to be made available for inspection, upon request, by the Ohio EPA for the life of the emissions unit or until the source is no longer subject to the provisions of 40 CFR 63 Subpart N. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA for a period of 5 years after each revision to the plan.
[40 CFR 63.342(f)(3)(v)]
- (7) To satisfy the requirements for the O&M Plan, the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of c).
[40 CFR 63.342(f)(3)(vi)]
- (8) The O&M Plan shall incorporate the maintenance and operational practices recommended by the manufacturer of the stalagmometer or tensiometer, which shall be used to measure surface tension of the electroplating or anodizing bath. Until (if) performance testing is conducted and an alternative parameter limitation is established, the surface tension of the electroplating or anodizing bath shall not to exceed 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter (2.4×10^{-3} pound-force/foot) as measured by a tensiometer at any time during tank operation.
[40 CFR 63.342 Table 1, and 40 CFR 63.342(c) and (d)]
- (9) If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the O&M Plan, the permittee shall record the actions taken for that event and shall report by phone 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.

[40 CFR 63.342(f)(3)(iv)]

- (10) The standards and limitations 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.
[40 CFR 63.342(g)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The surface tension shall be monitored according to the following schedule:
- a. The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of 40 CFR Part 63, Subpart N.
 - b. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed is once every 40 hours of tank operation.
 - c. Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph d)(1)b above. [See also 40 CFR 63.343(c)(5)(ii)(C).]
 - d. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of paragraphs d)(1)b and d)(1)c above.
[40 CFR 63.343(c)(5)]
- (2) The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A. [See also Table 1 to Subpart N of 40 CFR 63.] All records shall be maintained for a period of 5 years in accordance with 40 CFR 63.10(b)(1).
[40 CFR 63.346(a)]
- (3) The permittee shall also 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 section c) 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 this emissions unit, the 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, 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 consistency 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 required by d)(1), 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, 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, or monitoring equipment;
 - k. For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing bath;
 - l. The total process operating time of this (hexavalent) emissions unit during the reporting period, and start and end times within the reporting period, if applicable;
 - m. All documentation supporting the notifications and reports required by 40 CFR Parts 63.9, 63.10 and 63.347.
[40 CFR 63.346(b)]
- e) Reporting Requirements
- (1) The permittee shall fulfill all reporting requirements outlined 40 CFR part 63 Subpart A. These reports shall be made to the Ohio EPA Northwest 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 Northwest District Office on or before the specified date.
[40 CFR 63.347(a)]

The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall submit an initial notification [in addition to the notification of construction or reconstruction required by 40 CFR 63.345(b)] as follows:
 - a. A notification of the date when construction or reconstruction was commenced, shall be submitted no later than 30 calendar days after such date.
 - b. A notification of the actual date of startup of the source shall be submitted within 30 calendar days after such date.
[40 CFR 63.347(c)(2)]
- (4) The permittee shall submit a "Notification of Compliance Status" (NOCS) as follows:
 - a. The applicable emission limitation and the methods that were used to determine compliance with this limitation.
 - b. The initial surface tension measurement(s).
 - c. The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements, if methods differ from those identified in this permit.
 - d. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards in Section c).
 - e. A statement by the permittee of the affected source as to whether the source has complied with the provisions of Subpart N under this permit.

The 'notification of compliance status' shall be submitted to the Ohio EPA no later than 30 days after startup of the modified (i.e. hexavalent) source.
[40 CFR 63.347(e)(2) and (3)]
- (5) Except as provided in e)(8), the permittee shall prepare a "Summary Report" to document the ongoing compliance status of this emissions unit. The report shall be completed annually and retained on site, and made available to the Ohio EPA Northwest District Office upon request. The report shall be completed annually except as provided in e)(6). The report shall include the following information:
 - a. The company name and address of the affected source.
 - b. An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c).

- c. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the NOCS required by e)(4).
- d. The beginning and ending dates of the reporting period.
- e. A description of the type of process performed in the affected source.
- f. The total operating time of the affected source during the reporting period.
- g. A summary of operating parameter (i.e. surface tension) values, including the total duration of periods of excess surface tension, the total duration of excess surface tension expressed as a percent of the total source 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, other known causes, and unknown causes.
- h. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in 40 CFR 63.342(f) were followed in accordance with the O&M Plan for the source.
- i. If the O&M Plan 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 report(s) required by 40 CFR 63.342(f)(3)(iv) documenting that the O&M Plan was not followed.
- j. A description of any changes in monitoring, processes, or controls since the last reporting period.
- k. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
- l. The date of the report.

The first summary report shall be required prior to one year after the date of the notification of e)(4). Subsequent reports shall be required annually thereafter, except as provided in e)(6) or e)(7).

[40 CFR 63.347(h)(1) and (g)(3)]

- (6) Except as provided in e)(8), if both of the following conditions are met in an annual report, semiannual reports shall be subsequently prepared, and submitted to Ohio EPA:
 - a. the total duration of excess surface tension [as indicated by the monitoring data collected by the permittee in accordance with d)(1)] is 1 percent or greater of the total operating time for the reporting period; and;
 - b. The total days of malfunctions, or any quality assurance check failures, of the monitoring equipment (i.e. stalagmometer or tensiometer) is 5 percent or greater of the total operating days. [in lieu of 40 CFR 63.347(h)(2)(i)(B)]

[40 CFR 63.347(h)(2)(i)]

- (7) Except as provided in e)(8), the summary reporting frequency [and requirement to submit, if applicable] shall remain as specified in e)(5), or as modified as in e)(6), or shall be as otherwise specified or approved, under the provisions of 40 CFR 63.347(h).
[40 CFR 63.346(a)]
- (8) In consideration of the operational flexibility of this plating operation between this emissions unit, P017, and emissions unit P015, and the overlap of applicable reporting requirements, the permittee accepts a requirement to submit the report required in e)(5) to Ohio EPA on a fixed semi-annual frequency for both of these emissions units (under this permit), except for any more stringent reporting frequency as otherwise may be established by the Director under 40 CFR 63.347(h)(2)(iii).
- (9) The permittee shall fulfill all reporting requirements in the General Provisions to 40 CFR 63, according to the applicability of Subpart A. [See also Table 1 to Subpart N of 40 CFR 63.]
[40 CFR 63.347(a)]
- f) Testing Requirements
- (1) Since this affected source is a decorative chromium electroplating tank, and wetting agent is used in the plating or anodizing bath to inhibit chromium emissions from the affected source, and the permittee complies with the applicable surface tension limits [40 CFR 63.342(c)(1)(iii), (c)(2)(iii), or (d)(2)] as demonstrated through the continuous compliance monitoring required by d)(2), pursuant to 40 CFR 63.343(b)(2), no initial performance testing is required. Pursuant to 40 CFR 63.343(b)(2)(iii), ongoing compliance shall be demonstrated in accordance with the monitoring requirements of d)(2).
- (2) Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities," appendix A of this part shall be used to measure the surface tension of electroplating and anodizing baths.
[40 CFR 63.344(c)(3)]
- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):
- a. Emission Limitation:
25.9 pound PM₁₀ per year
- Applicable Compliance Method:
To determine compliance with the emission limit, the following equation shall be used:
- $$E_{PM} = EF_{PM} \times Rc \times 1/7,000 \times H_{yr} \times (1-CE)$$
- where:
- E_{PM} = maximum annual PM₁₀ emissions in tons per year
- EF_{PM} = PM₁₀ emission factor of 0.069 grains-amp/hour (from AP-42, Section 12.20, Table 12.20-1 for decorative chromium electroplating with fume suppressant)



Rc = rectifier capacity (10,000 amps, for this emissions unit)

1/7,000 = 1 pound per 7,000 grains to convert from grain/hr to lb/hr

H_{yr} = 8760 hours of operation per year

CE = Control efficiency – 97% (0.97)

If required, compliance shall be determined in accordance with Test Methods 1-5 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

- b. Emission Limitation:
12.4 pound Cr compounds per year

Applicable Compliance Method:

To determine compliance with the emission limit, the following equation shall be used:

$$E_{CR} = EF_{CR} \times Rc \times 1/7,000 \times H_{yr} \times (1-CE)$$

where:

E_{CR} = actual annual chromium emissions in tons per year

EF_{CR} = chromium compounds emission factor of 0.033 grains-amp/hour (from AP-42, Section 12.20, Table 12.20-1 for decorative chromium electroplating with fume suppressant)

Rc = rectifier capacity (10,000 amps, for this emissions unit)

1/7,000 = 1 pound per 7,000 grains to convert from grain/hr to lb/hr

H_{yr} = 8760 hours of operation per year

CE = Control efficiency – 97% (0.97)

If required, compliance shall be determined in accordance with Test Methods 306 or 306A as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

- g) Miscellaneous Requirements

- (1) This permit (and permit P0106768 for emissions unit P015) supersedes Permit to Install (PTI) 03-17236 issued April 12, 2007 for emissions unit P015.