

Facility ID: 0243081292 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](#)
- [Go to Part II for Emissions Unit P004](#)

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

Facility ID: 0243081292 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
conveyorized hard chrome electroplating bath with composite mesh-pad system; VFC-1	OAC rule 3745-31-05(A)(3) (PTI # 02-8926)	0.001 lb/hr of total chromium or 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of total exhaust gases  There shall be no visible emissions from any part of the process or the exhaust stack.
	40 CFR, Part 63, Subpart N	See section A.2.a. The emission limitations and control requirements in this regulation are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The visible emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
rust preventative application	OAC rule 3745-21-09(U)(1)(a)	4.3 lbs of volatile organic compounds ("VOC") per gallon of coating, excluding water and exempt solvents, as applied

**2. Additional Terms and Conditions**

- (a) This chrome plating line shall be equipped with a multiple stage composite mesh-pad system, including a mist eliminator to control chemical particulate emissions in the form of total chromium.  
  
Maintenance of the composite mesh-pad system shall be performed as required in 40 CFR, Part 63, Subpart N, "National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks."

**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 occurrence 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 Northeast District Office of Ohio EPA ("NEDO"), 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, NEDO 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.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
- a. The plan shall specify the operation and maintenance (O&M) criteria for the affected source, the composite mesh-pad control system, 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. If a pitot tube is used for monitoring, the O&M plan shall incorporate the following work practice standards to be performed at least once per quarter:
    - i. Backflush with water, or remove from the duct and rinse with fresh water.
    - ii. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained.
    - iii. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued.
  - d. 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.
  - e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, the composite mesh-pad control system, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - f. 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.
  - g. 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 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 NEDO.
  - h. The permittee shall keep the written O&M plan on record after it is developed to be made available for inspection, upon request, by NEDO for the life of the emissions unit. If the O&M plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by NEDO for a period of five years after each revision to the plan.
  - i. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the O&M plan requirements as long as the alternative plans meet the requirements.
5. The composite mesh-pad system shall be operated within +/- 1 inch of water column of the pressure drop value of 3.25 inches of water column established during the initial performance test.

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

1. Composite mesh-pad control system monitoring requirements to demonstrate continuous compliance:
 

The permittee shall monitor and record the pressure drop across the composite mesh-pad control system once each day that the emission unit is operating.
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.
3. The permittee also shall maintain the following records:
  - a. Inspection records for the composite mesh-pad control system 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, the composite mesh-pad control system, and monitoring equipment.

- c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, the composite mesh-pad control system, 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 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, the composite mesh-pad control system, 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, the composite mesh-pad control system, or monitoring equipment.
- 4. The permittee shall collect and record the following information each day for the rust preventative portion of this emissions unit:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed; and
  - c. the VOC content of each coating employed, in pounds per gallon excluding water and exempt solvents.

**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 NEDO 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 NEDO 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.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the O&M plan for the emissions unit.
  - h. If the O&M 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.

The report shall be completed annually and retained on site, and made available to NEDO upon request.
- 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. NEDO 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 record keeping and monitoring requirements of 40 CFR, Part 63, Subpart A and this permit.
  - c. NEDO 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 NEDO in writing of its intentions to make such a change. NEDO may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping 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, NEDO 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.
7. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to NEDO which includes the following:
  - a. The permittee's name, title, and address.
  - b. The address (i.e., physical location) or proposed address of the affected emissions unit if different from the permittee's.
  - c. A notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR 63.2.
  - d. An identification of 40 CFR, Part 63, Subpart N as the basis for the notification.
  - e. The expected commencement and completion dates of the construction or reconstruction.
  - f. The anticipated date of (initial) startup.
  - g. The type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing).
  - h. A description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity if an add-on air pollution control device is used.
  - i. An estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR, Part 63, Subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.
8. If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to NEDO:
  - a. A brief description of the affected emissions unit and the components to be replaced.
  - b. A brief description of the present and proposed emission control technique.
  - c. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new emissions unit.
  - d. The estimated life of the affected emissions unit after the replacements.
  - e. A discussion of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to NEDO's satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.
9. The permittee shall report to NEDO 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.
10. The permittee shall notify NEDO in writing of any daily record showing the use of noncomplying coatings in the rust preventative portion of this emissions unit. The notification shall include a copy of such record and shall be sent to NEDO within 30 days following the date of noncompliance.

**E. Testing Requirements**

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

0.001 lb/hr of total chromium or 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of total exhaust gases

**Applicable Compliance Method:**

Performance tests were conducted on August 23, 1995 with results showing average chromium emission rates of 0.00118 mg/dscm for this emissions unit. If required, additional performance testing shall be conducted in accordance with the test methods and procedures specified in 40 CFR, Part 63, Subpart N. Ongoing compliance shall be based upon the established operating parameters for the pressure drop across the composite mesh-pad emission control system.

**Emissions Limitation:**

There shall be no visible emissions from any part of the process or the exhaust stack.

**Applicable Compliance Method:**

Compliance with the visible emissions limitation above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

**Emission Limitation:**

4.3 lbs of VOC per gallon of coating, excluding water and exempt solvents, as applied

**Applicable Compliance Method:**

Compliance with the above VOC emission limitation shall be determined by the record keeping specified in section C.4. of these terms and conditions.

2. USEPA Method 24 or 24A shall be used to determine the VOC content for all coatings employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**F. Miscellaneous Requirements**

1. None

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**Facility ID: 0243081292 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
conveyorized hard chrome electroplating bath with composite mesh-pad system; VFC-2	OAC rule 3745-31-05(A)(3) (PTI # 02-8926)	0.001 lb/hr of total chromium or 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of total exhaust gases  There shall be no visible emissions from any part of the process or the exhaust stack.  See section A.2.a.
	40 CFR, Part 63, Subpart N	The emission limitations and control requirements in this regulation are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The visible emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

rust preventative application	OAC rule 3745-21-09(U)(1)(a)	4.3 lbs of volatile organic compounds ("VOC") per gallon of coating, excluding water and exempt solvents, as applied
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2. **Additional Terms and Conditions**

- (a) This chrome plating line shall be equipped with a multiple stage composite mesh-pad system, including a mist eliminator to control chemical particulate emissions in the form of total chromium.

Maintenance of the composite mesh-pad system shall be performed as required in 40 CFR, Part 63, Subpart N, "National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks."

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 occurrence 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 Northeast District Office of Ohio EPA ("NEDO"), 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, NEDO 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.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance (O&M) criteria for the affected source, the composite mesh-pad control system, 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. If a pitot tube is used for monitoring, the O&M plan shall incorporate the following work practice standards to be performed at least once per quarter:
    - i. Backflush with water, or remove from the duct and rinse with fresh water.
    - ii. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained.
    - iii. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued.
  - d. 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.
  - e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, the composite mesh-pad control system, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - f. 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.
  - g. 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 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 NEDO.
  - h. The permittee shall keep the written O&M plan on record after it is developed to be made available for inspection, upon request, by NEDO for the life of the emissions unit. If the O&M plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by NEDO for a period of five years after each revision to the plan.
  - i. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and

Health Administration (OSHA) plans, or other existing plans to meet the O&M plan requirements as long as the alternative plans meet the requirements.

5. The composite mesh-pad system shall be operated within +/- 1 inch of water column of the pressure drop value of 3.4 inches of water column established during the initial performance test.

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

1. Composite mesh-pad control system monitoring requirements to demonstrate continuous compliance:

The permittee shall monitor and record the pressure drop across the composite mesh-pad control system once each day that the emission unit is operating.

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.

3. The permittee also shall maintain the following records:

- a. Inspection records for the composite mesh-pad control system 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, the composite mesh-pad control system, and monitoring equipment.

- c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, the composite mesh-pad control system, 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 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, the composite mesh-pad control system, 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, the composite mesh-pad control system, or monitoring equipment.

4. The permittee shall collect and record the following information each day for the rust preventative portion of this emissions unit:

- a. the company identification for each coating employed;

- b. the number of gallons of each coating employed; and

- c. the VOC content of each coating employed, in pounds per gallon excluding water and exempt solvents.

**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 NEDO 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 NEDO 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.

- d. The beginning and ending dates of the reporting period.

- e. The total operating time of the emissions unit during the reporting period.

- f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.

- g. A certification by a responsible official that the work practice standards in this permit were followed in

accordance with the O&M plan for the emissions unit.

h. If the O&M 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.

The report shall be completed annually and retained on site, and made available to NEDO upon request.

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. NEDO 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 record keeping and monitoring requirements of 40 CFR, Part 63, Subpart A and this permit.
  - c. NEDO 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 NEDO in writing of its intentions to make such a change. NEDO may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping 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, NEDO 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.
7. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to NEDO which includes the following:
  - a. The permittee's name, title, and address.
  - b. The address (i.e., physical location) or proposed address of the affected emissions unit if different from the permittee's.
  - c. A notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR 63.2.
  - d. An identification of 40 CFR, Part 63, Subpart N as the basis for the notification.
  - e. The expected commencement and completion dates of the construction or reconstruction.
  - f. The anticipated date of (initial) startup.
  - g. The type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing).
  - h. A description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity if an add-on air pollution control device is used.
  - i. An estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR, Part 63, Subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.
8. If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to NEDO:

- a. A brief description of the affected emissions unit and the components to be replaced.
  - b. A brief description of the present and proposed emission control technique.
  - c. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new emissions unit.
  - d. The estimated life of the affected emissions unit after the replacements.
  - e. A discussion of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to NEDO's satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.
- 9. The permittee shall report to NEDO 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.
- 10. The permittee shall notify NEDO in writing of any daily record showing the use of noncomplying coatings in the rust preventative portion of this emissions unit. The notification shall include a copy of such record and shall be sent to NEDO within 30 days following the date of noncompliance.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emissions Limitation:  
0.001 lb/hr of total chromium or 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of total exhaust gases  
  
Applicable Compliance Method:  
Performance tests were conducted on October 10, 1996 with results showing average chromium emission rates of 0.000251 mg/dscm for this emissions unit. If required, additional performance testing shall be conducted in accordance with the test methods and procedures specified in 40 CFR, Part 63, Subpart N. Ongoing compliance shall be based upon the established operating parameters for the pressure drop across the composite mesh-pad emission control system.  
Emissions Limitation:  
There shall be no visible emissions from any part of the process or the exhaust stack.  
  
Applicable Compliance Method:  
Compliance with the visible emissions limitation above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").  
Emission Limitation:  
4.3 lbs of VOC per gallon of coating, excluding water and exempt solvents, as applied  
  
Applicable Compliance Method:  
Compliance with the above VOC emission limitation shall be determined by the record keeping specified in section C.4. of these terms and conditions.
- 2. USEPA Method 24 or 24A shall be used to determine the VOC content for all coatings employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**F. Miscellaneous Requirements**

- 1. None

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

**Facility ID: 0243081292 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the

applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
conveyorized hard chrome electroplating bath with composite mesh-pad system; VFC-4	OAC rule 3745-31-05(A)(3) (PTI # 02-8926)	0.001 lb/hr of total chromium or 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of total exhaust gases  There shall be no visible emissions from any part of the process or the exhaust stack.
	40 CFR, Part 63, Subpart N	See section A.2.a. The emission limitations and control requirements in this regulation are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The visible emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
rust preventative application	OAC rule 3745-21-09(U)(1)(a)	4.3 lbs of volatile organic compounds ("VOC") per gallon of coating, excluding water and exempt solvents, as applied

**2. Additional Terms and Conditions**

- (a) This chrome plating line shall be equipped with a multiple stage composite mesh-pad system, including a mist eliminator to control chemical particulate emissions in the form of total chromium.  
  
Maintenance of the composite mesh-pad system shall be performed as required in 40 CFR, Part 63, Subpart N, "National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks."

**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 occurrence 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 Northeast District Office of Ohio EPA ("NEDO"), 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, NEDO 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.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance (O&M) criteria for the affected source, the composite mesh-pad control system, 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. If a pitot tube is used for monitoring, the O&M plan shall incorporate the following work practice standards to be performed at least once per quarter:
    - i. Backflush with water, or remove from the duct and rinse with fresh water.

- ii. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained.
- iii. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued.
- d. 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.
- e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, the composite mesh-pad control system, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
- f. 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.
- g. 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 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 NEDO.
- h. The permittee shall keep the written O&M plan on record after it is developed to be made available for inspection, upon request, by NEDO for the life of the emissions unit. If the O&M plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by NEDO for a period of five years after each revision to the plan.
- i. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the O&M plan requirements as long as the alternative plans meet the requirements.

- 5. The composite mesh-pad system shall be operated within +/- 1 inch of water column of the pressure drop value of 4.15 inches of water column established during the initial performance test.

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

- 1. Composite mesh-pad control system monitoring requirements to demonstrate continuous compliance:
  - The permittee shall monitor and record the pressure drop across the composite mesh-pad control system once each day that the emission unit is operating.
- 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.
- 3. The permittee also shall maintain the following records:
  - a. Inspection records for the composite mesh-pad control system 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, the composite mesh-pad control system, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, the composite mesh-pad control system, 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 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, the composite mesh-pad control system, 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, the composite mesh-pad control system, or monitoring equipment.
- 4. The permittee shall collect and record the following information each day for the rust preventative portion of this emissions unit:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed; and
  - c. the VOC content of each coating employed, in pounds per gallon excluding water and exempt solvents.

**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 NEDO 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 NEDO 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.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the O&M plan for the emissions unit.
  - h. If the O&M 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.
- The report shall be completed annually and retained on site, and made available to NEDO upon request.
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. NEDO 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 record keeping and monitoring requirements of 40 CFR, Part 63, Subpart A and this permit.
  - c. NEDO 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 NEDO in writing of its intentions to make such a change. NEDO may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping 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, NEDO 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.
7. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to NEDO which includes the following:
- a. The permittee's name, title, and address.

- b. The address (i.e., physical location) or proposed address of the affected emissions unit if different from the permittee's.
  - c. A notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR 63.2.
  - d. An identification of 40 CFR, Part 63, Subpart N as the basis for the notification.
  - e. The expected commencement and completion dates of the construction or reconstruction.
  - f. The anticipated date of (initial) startup.
  - g. The type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing).
  - h. A description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity if an add-on air pollution control device is used.
  - i. An estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR, Part 63, Subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.
8. If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to NEDO:
- a. A brief description of the affected emissions unit and the components to be replaced.
  - b. A brief description of the present and proposed emission control technique.
  - c. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new emissions unit.
  - d. The estimated life of the affected emissions unit after the replacements.
  - e. A discussion of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to NEDO's satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.
9. The permittee shall report to NEDO 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.
10. The permittee shall notify NEDO in writing of any daily record showing the use of noncomplying coatings in the rust preventative portion of this emissions unit. The notification shall include a copy of such record and shall be sent to NEDO within 30 days following the date of noncompliance.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
- Emissions Limitation:  
0.001 lb/hr of total chromium or 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of total exhaust gases
- Applicable Compliance Method:  
Performance tests were conducted on October 10, 1996 with results showing average chromium emission rates of 0.000136 mg/dscm for this emissions unit. If required, additional performance testing shall be conducted in accordance with the test methods and procedures specified in 40 CFR, Part 63, Subpart N. Ongoing compliance shall be based upon the established operating parameters for the pressure drop across the composite mesh-pad emission control system.
- Emissions Limitation:  
There shall be no visible emissions from any part of the process or the exhaust stack.
- Applicable Compliance Method:  
Compliance with the visible emissions limitation above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
- Emission Limitation:  
4.3 lbs of VOC per gallon of coating, excluding water and exempt solvents, as applied
- Applicable Compliance Method:  
Compliance with the above VOC emission limitation shall be determined by the record keeping specified in section C.4. of these terms and conditions.
2. USEPA Method 24 or 24A shall be used to determine the VOC content for all coatings employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**F. Miscellaneous Requirements**

1. None