



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1296
NESHAP

CERTIFIED MAIL

November 26, 1997

DEC 10 1997

ACME INDUSTRIAL GROUP
RICHARD BURTON
PO BOX 2388
ALLIANCE, OH 44601

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 15-1296
APS Premise No. 1576010639
Permit Fee: \$2000.00

Name of Facility: ACME INDUSTRIAL GROUP

Person to Contact: RICHARD BURTON

Address: PO BOX 2388
ALLIANCE, OH 44601

Location of proposed source(s): 540 N. FREEDOM AVENUE
ALLIANCE, OHIO

Description of proposed source(s):
FIVE HARD CHROME ELECTROPLATING TANKS.

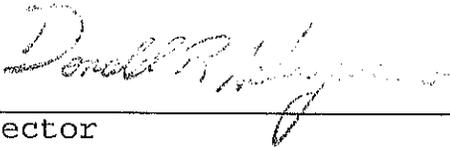
Date of Issuance: November 26, 1997

Effective Date: November 26, 1997

The above named entity is hereby granted a permit to install for the above described source(s) 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 above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for ACME INDUSTRIAL GROUP located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P013	Hard chrome electro-plating tank number 1 with 3,000 Amps rectifier; serviced by composite meshpads. This pollution control device also services new emissions units P014 (Tank number 2) and P015 (Tank number 3). ACME Industrial Group is a large facility as defined by 40 CFR Part 63, Subpart N, based on maximum cumulative potential rectifier capacity of more than 60 million amp-hour/year.	Compliance with the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electro-plating and Chromium Anodizing Tanks; use of a composite meshpad.	3745-31-05 40 CFR Part 63, Subpart N	0.015 milligram of total chromium per dry standard cubic meter (mg/dscm) 0.000618 pound/hour total chromium (total allowable P013, P014, and P015) (11,000 ACFM) 0.0027 ton/year total chromium (total allowable P013, P014 and P015)

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P014	Hard chrome electro-plating tank number 2 with 3,000 Amps rectifier; serviced by composite meshpads. This pollution control device also services new emissions units P013 (Tank number 1) and P015 (Tank number 3). ACME Industrial Group is a large facility as defined by 40 CFR Part 63, Subpart N, based on maximum cumulative potential rectifier capacity of more than 60 million amp-hour/year.	Compliance with the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electro-plating and Chromium Anodizing Tanks; use of a composite meshpad.	3745-31-05 40 CFR Part 63, Subpart N	0.015 milligram of total chromium per dry standard cubic meter (mg/dscm) 0.000618 pound/hour total chromium (total allowable P013, P014, and P015) (11,000 ACFM) 0.0027 ton/year total chromium (total allowable P013, P014 and P015)

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P015	<p>Hard chrome electro-plating tank number 3 with 3,000 Amps rectifier; serviced by composite meshpads. This pollution control device also services new emissions units P013 (Tank number 1) and P014 (Tank number 2). ACME Industrial Group is a large facility as defined by 40 CFR Part 63, Subpart N, based on maximum cumulative potential rectifier capacity of more than 60 million amp-hour/year.</p>	<p>Compliance with the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electro-plating and Chromium Anodizing Tanks; use of a composite meshpad pollution control device.</p>	<p>3745-31-05 40 CFR Part 63, Subpart N</p>	<p>0.015 milligram of total chromium per dry standard cubic meter (mg/dscm) of ventilation air</p> <p>0.000618 pound/hour total chromium (total allowable P013, P014, and P015) (Based on 11,000 ACFM)</p> <p>0.0027 ton/year total chromium (total allowable for tanks P013, P014 and P015)</p>

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P016	Hard chrome electro-plating tank number 5, 500 Amps rectifier; serviced by composite meshpads. This pollution control device also services new emissions units P017 (Tank number 7). ACME Industrial Group is a large facility as defined by 40 CFR Part 63, Subpart N, based on maximum cumulative potential rectifier capacity of more than 60 million amp-hour/year.	Compliance with the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electro-plating and Chromium Anodizing Tanks; use of composite meshpads.	3745-31-05 40 CFR Part 63, Subpart N	0.015 milligram of total chromium per dry standard cubic meter (mg/dscm) 0.000365 pound/hour total chromium (total allowable for P016 and P017) (6,500 ACFM) 0.0018 ton/year total chromium (total allowable for P016 and P017)

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P017	Hard chrome electro-plating tank number 7, with 5,000 Amps rectifier; serviced by composite meshpads. This pollution control device also services new emissions unit P016. ACME Industrial Group is a large facility as defined by 40 CFR Part 63, Subpart N, based on maximum cumulative potential rectifier capacity of more than 60 million amp-hour/year.	Compliance with the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electro-plating and Chromium Anodizing Tanks; use of composite meshpads.	3745-31-05 40 CFR Part 63, Subpart N	0.015 milligram of total chromium per dry standard cubic meter (mg/dscm) 0.000365 pound/hour total chromium (total allowable for P016 and P017) (6,500 ACFM) 0.0018 ton/year total chromium (total allowable for P016 and P017)

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Total Chromium	.0045

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Requirements

1. This facility, in its construction and operation of emissions units P013, P014, P015, P016 and P017, shall comply immediately upon startup with the applicable sections of 40 CFR, Part 63, Subpart N, the chrome plating NESHAP.
2. Emissions units P013, P014, P015 shall be serviced by a composite meshpad pollution control device, which shall be operated whenever any of these emissions units is operated. Emissions units P016 and P017 shall be served by a second composite meshpad pollution control device, which shall be operated whenever any of these emissions units is operated.
3. The 0.015 mg/dscm emission limit shall apply to each of the above emissions units when it is operating and shall apply to any combination of the above emissions units which are operating except during periods of malfunction.
4. 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.
5. Malfunctions shall be corrected as soon as practical after their occurrence in accordance with the operation and maintenance plan.
6. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Canton City Health

Department, Air Pollution Control Division, 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 units. Based on this information, the Canton City Health Department, Air Pollution Control Division, may require that the permittee make changes to the operation and maintenance plan if that plan:

- a. does not address a malfunction that has occurred;
 - b. fails to provide for the operation of the emissions units, the air pollution control technique, 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.
7. The permittee shall prepare an operation and maintenance plan to be implemented upon startup of these emissions units. The plan shall include the following elements:
- a. the plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment;
 - b. the operation and maintenance 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 meshpad 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 the tank to the control device to ensure there are no leaks; and,

- iv. perform wash down of the composite meshpads in accordance with the manufacturer's recommendations.
- c. the plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
- d. the plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions;
- e. if the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan 45 days after such an event occurs;
- f. if actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event unless the permittee makes alternative reporting arrangements in advance with the Canton City Health Department, Air Pollution Control Division;
- g. the permittee shall keep the written operation and maintenance plan on record after it has been developed to be made available for inspection upon request by the Canton City Health Department, Air Pollution Control Division, for the life of the emissions units. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the Canton City Health Department, Air Pollution Control Division, for a period of five years after each revision to the plan; and,
- h. the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or

other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

8. The maximum flow rate of air and pollutants exiting emissions units P013, P014 and P015 and entering the composite meshpad pollution control device shall be 11,000 ACFM.
9. The maximum flow rate of air and pollutants exiting emissions unit P016 and P017 and entering the composite meshpad pollution control device shall be 6,500 ACFM.

B. Monitoring and Recordkeeping Requirements

1. Compliance meshpad (CMP) system monitoring requirements to demonstrate continuous compliance:
 - a. during the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite meshpad system. The permittee shall establish, as a site-specific operating parameter, the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit;
 - b. the permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept ± 1 inch of water column from this value as the compliant range; and,
 - c. on and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite meshpad once each day that the emissions unit is operating. To be in compliance, the composite meshpad system shall be operating within ± 1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

2. Recordkeeping Requirements

- a. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A.
- b. The permittee shall also maintain the following records:
 - i. inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
 - ii. records of all maintenance performed on the emissions units, add-on air pollution control device, and monitoring equipment;
 - iii. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment;
 - iv. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
 - v. other records, which may take the form of checklists, necessary to demonstrate consistence with the provisions of the operation and maintenance plan;
 - vi. test reports documenting results of all performance tests;
 - vii. all measurements as may be necessary to determine the conditions of performance tests;
 - viii. records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected;

- ix. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment;
 - x. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment;
 - xi. the total process operating time of the emission unit during the reporting period; and,
 - xii. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and 63.9 and 63.10 of 40 CFR Part 63, Subpart A.
- c. All records shall be maintained for a period of five years.

C. Reporting Requirements

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR, Part 63, Subpart A. These reports shall be made to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, 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 by other methods shall be received by the Canton City Health Department, Air Pollution Control Division, on or before the specified date.
2. The permittee shall submit to the Canton City Health Department, Air Pollution Control Division, an initial notification report that contains the following information:
 - a. the name, title, and address of the owner or operator;
 - b. the address (i.e., physical location) of the emissions unit;

- c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emission unit is located at a major source or at an area source;
 - e. the maximum potential cumulative rectifier capacity;
 - f. a statement of whether the emissions units are located at a small or a large, hard chromium facility, and whether this will be demonstrated through actual or maximum potential cumulative rectifier capacity; and,
 - g. a statement of whether the permittee will limit the maximum potential cumulative rectifier capacity such that the hard chromium electroplating facility is considered small.
3. The permittee shall submit a Notification of Performance Test to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, at least 60 calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance test as scheduled, the provisions of Section 63.7(b)(2) of 40 CFR, Part 63, Subpart A apply.
4. The permittee shall submit a Notification of Compliance Status to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702 ninety days after the performance test is completed. The Notification of Compliance Status is to be signed by the responsible official, who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The Notification shall list for each affected emissions unit:
- a. the applicable emission limitations and the methods that were used to determine compliance with this limitation;
 - b. if a performance test is required, the test report documenting the results of the performance test, which includes the element required in the Test Requirements section of this permit, including measurements and calculations to support special compliance provisions for multiple emissions units controlled by a common, add-on air pollution control device;
 - c. the type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm

- or mg/hr if the emissions unit is using the special provisions for multiple emissions units controlled by a common add-on air pollution control device;
- d. for each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;
 - e. the methods that will be used to determine continuous compliance;
 - f. a description of the air pollution technique used for each emission point;
 - g. a statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards; and,
 - h. a statement by the owner/operator as to whether the emissions unit is in compliance.
5. The permittee shall report to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702 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.
6. The permittee shall submit a summary report semiannually (unless a request to reduce frequency of ongoing compliance reports has been approved) to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, 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 units;
 - b. an identification of the operating parameter that is monitored for compliance determination;
 - c. the relevant emission limitation for the emissions unit and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section;

- d. the beginning and ending dates of the reporting period;
- e. the total operating time of the emissions unit during the reporting period;
- f. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit's 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, controls equipment malfunctions, other known causes, and unknown causes;
- g. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;
- h. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;
- i. a description of any changes in monitoring, processes, or controls since the last reporting period;
- j. the name, title, and signature of the responsible official who is certifying the accuracy of the report;
- k. the date of the report; and,
- l. the reports shall be submitted semiannually except when:
 - i. the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702 determined that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit; or,
 - ii. the monitoring data collected by the permittee shows that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once an exceedance is reported, ongoing compliance

status reports shall be submitted quarterly until a request to reduce reporting frequency is approved.

7. The permittee shall submit a notification of construction or reconstruction as soon as practical before the construction or reconstruction has commenced to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, 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, Part 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; and,
 - 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 emissions 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 the following information to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702:

- 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 the construction of an entirely new, comparable unit;
- d. the estimated life of the affected emissions unit after replacements; and,
- e. a discussion of any economic or technical limitations that 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 the Canton City Health Department, Air Pollution Control Division, satisfaction that the technical or economic limitations affected the emissions unit's ability to comply with the relevant standard and how they do so.

D. Compliance Methods and Emission Testing Requirements

1. Compliance Methods:

Compliance with the emission limitations in the Air Emission Summary and Part A of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

<u>Emissions Limitation</u>	<u>Applicable Compliance Methods</u>
0.015 mg total chromium/ dscm of ventilation air for Emissions Units P013, P014 and P015	Emissions Testing as per Additional Special Terms and Conditions D.2.
0.000618 pound/hour total chromium for Emissions Units P013, P014 and P015	Emissions Testing as per Additional Special Terms and Conditions D.2.
0.0027 ton/year total chromium for Emissions Units P013, P014 and P015	Emissions Testing as per Additional Special Terms and Conditions and annual recordkeeping
0.015 mg total chromium/ dscm of ventilation air for Emissions Units P016 and P017	Emissions Testing as per Additional Special Terms and Conditions D.2.

<u>Emissions Limitation</u>	<u>Applicable Compliance Methods</u>
0.000365 pound/hour total chromium for Emissions Units P016 and P017	Emissions Testing as per Additional Special Terms and Conditions D.2.
0.0018 ton/year total chromium for Emissions Units P016 and P017	Emissions Testing as per Additional Special Terms and Conditions and annual recordkeeping

2. Emission Testing Requirements:

- a. performance test results shall be documented in complete test reports that contain the following information:
 - i. a brief process description;
 - ii. sampling location description(s);
 - iii. a description of sampling and analytical procedures and any modifications to standard procedures;
 - iv. test results;
 - v. quality assurance procedures and results;
 - vi. records of operating conditions during testing, preparation of standards, and calibration procedures;
 - vii. raw data sheets for field sampling and field and laboratory analyses;
 - viii. documentation of calculations; and,
 - ix. any other information required by the test method.

The test plan shall be made available to the Canton City Health Department, Air Pollution Control Division, prior to testing, if requested.
- b. if the permittee conducts performance testing at startup to obtain a permit to install, the results of such testing may be used to demonstrate compliance if:
 - i. the test methods and procedures identified in this permit were used during the performance test;

- ii. the performance test was conducted under representative operating conditions;
- iii. the performance test report contains the elements of paragraphs a.i through a.ix in this section; and,
- iv. the permittee has sufficient data to establish the operating parameter value that corresponds to compliance as required for continuous compliance monitoring.

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

- c. the permittee shall use the following test methods to conduct an initial performance test:

- i. Method 306 or Method 306A, "Determination of Chromium Emissions from Decorative and Hard Chromium Electroplating and Anodizing Operations" shall be used to determine the chromium concentration from hard or decorative chromium electroplating tanks and chromium anodizing tanks.
 - aa. the sampling time and sample volume for each run of Methods 306 and 306A shall be at least 120 minutes and 1.7 dscm (60 dscf), respectively; and,
 - bb. Methods 306 and 306A allow the measurements of either total chromium or hexavalent chromium emissions. Emissions units using chromic acid baths can demonstrate compliance with the emission limits by measuring either the total chromium or hexavalent chromium concentration. Hence, the hexavalent chromium concentration measured by these methods is equal to the chromium concentration for the affected operations.
- ii. The California Air Resources Board (CARB) Method 425 may be used to determine the chromium concentration from hard and decorative chromium electroplating tanks and chromium anodizing tanks if the following conditions are met:

1. if a calorimetric analysis method is used, the sampling time and volume shall be sufficient to result in 33-66 micrograms of catch in the sampling train;
 2. if an Atomic Absorption Graphite Furnace (AAGF) or Ion Chromatography (with a Post-column Reactor (ICPCR) analyses) is used, the sampling time and volume should be sufficient to result in a sample catch that is 5 to 10 times the minimum detection limit of the analytical method (i.e., 1.0 microgram per liter of sample for AAGF and 0.5 microgram per liter of sample for ICPCR); and,
 3. a minimum of three separate runs must be conducted. The other requirements of Section 63.7 of 40 CFR, Part 63, Subpart A must also be met.
- d. all monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected emissions unit are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. Specifications for differential pressure measurement devices used to measure pressure drop across a control system shall be in accordance with the manufacturer's accuracy specifications;
- e. the permittee shall measure the pressure drop across the add-on air pollution control device in accordance with the following guidelines;
- f. pressure taps shall be installed at any of the following locations:
- i. at the inlet and outlet of the control system. The inlet tap should be installed in the ductwork just prior to the control device and the corresponding outlet pressure tap should be installed on the outlet side of the control device prior to the blower or on the downstream side of the blower;

- ii. on each side of the packed bed within the control system or on each side of each mesh pad within the control system; and,
 - iii. on the front side of the first mesh pad and back side of the last mesh pad within the control system.
- g. pressure taps shall be sited at locations that are:
- i. as free from pluggage as possible and away from any flow disturbances such as cyclonic demisters; and,
 - ii. situated such that no air infiltration at the measurement site will occur that could bias the measurement.
- h. pressure taps shall be constructed of either polyethylene, polybutylene, or other nonreactive materials;
- i. nonreactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop;
- j. any of the following pressure gauges can be used to monitor pressure drop: a magnehelic gauge, an included manometer, or a "U" tube manometer;
- k. prior to connecting any pressure lines to the pressure gauge(s), each gauge shall be zeroed. No calibration of the pressure gauges is required; and,
- l. when multiple affected emissions units performing the same type of operation (e.g., all are performing hard chromium electroplating) and subject to the same emission limitations are controlled with an add-on air pollution control device that is not controlling emissions from any other type of affected operation or from any nonaffected emissions unit, the emission limitation 0.015 mg/dscm must be met at the outlet of the add-on air pollution control device.

E. Miscellaneous Requirements

1. The owner or operator of an affected source subject to the requirements of 40 CFR, Part 63, Subpart N shall obtain a Title V permit from the Ohio Environmental Protection Agency, Division of Air Pollution Control. The timing of obtaining this Title V operating permit shall be in accord with the current regulations, rules

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and policies of the United States Environmental
Protection Agency and the Ohio Environmental Protection
Agency.