



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

7/5/2012

Certified Mail

Joseph Roth  
Manufacturers Plating Company, Inc.  
1859 East 63rd Street  
Cleveland, OH 44103

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1318000838  
Permit Number: P0110259  
Permit Type: Administrative Modification  
County: Cuyahoga

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

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

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Cleveland Division of Air Quality. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
CDAQ; Pennsylvania; Canada





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Manufacturers Plating Company, Inc.**

Facility ID: 1318000838  
Permit Number: P0110259  
Permit Type: Administrative Modification  
Issued: 7/5/2012  
Effective: 7/5/2012





Division of Air Pollution Control
Permit-to-Install
for
Manufacturers Plating Company, Inc.

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## Authorization

Facility ID: 1318000838  
Facility Description: Plastic part decorative chrome plating operation.  
Application Number(s): M0001750  
Permit Number: P0110259  
Permit Description: This PTI Admin Mod (P0110259) needs to incorporate the < 10 tpy exemption from BAT language into its terms and conditions before it is added to the Title V renewal permit. PTI 13-04753 was issued 7/22/2008.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 7/5/2012  
Effective Date: 7/5/2012

This document constitutes issuance to:

Manufacturers Plating Company, Inc.  
1859 East 63rd Street  
Cleveland, OH 44103

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

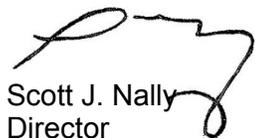
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erievue Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(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 emissions unit(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

  
Scott J. Nally  
Director



## **Authorization (continued)**

Permit Number: P0110259

Permit Description: This PTI Admin Mod (P0110259) needs to incorporate the < 10 tpy exemption from BAT language into its terms and conditions before it is added to the Title V renewal permit. PTI 13-04753 was issued 7/22/2008.

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

<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	Exterior Chrome Line
Superseded Permit Number:	13-04753
General Permit Category and Type:	Not Applicable



## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Cleveland Division of Air Quality.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Cleveland Division of Air Quality. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Cleveland Division of Air Quality every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Cleveland Division of Air Quality in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Cleveland Division of Air Quality concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Cleveland Division of Air Quality.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Cleveland Division of Air Quality. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## 10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## 11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## 14. 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.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.

## **C. Emissions Unit Terms and Conditions**



**1. P007, Exterior Chrome Line**

**Operations, Property and/or Equipment Description:**

Decorative Chrome Plating Line employing a chemical fume suppressant with wetting agent and two packed-bed scrubbers.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) As effective 11/30/2001	Visible fugitive particulate emissions shall not exceed 5% opacity as a 3-minute average.  The requirements of this rule include compliance with the requirements of 40 CFR Part 63 Subpart N.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) As effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average. This limitation shall apply after USEPA approves the SIP per b)(2)a. below.
d.	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63 Subpart N.
e.	40 CFR Part 63 Subpart N	See b)(2)c. below.

## (2) Additional Terms and Conditions

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the visible fugitive particulate emissions from this air contaminant source since the uncontrolled potential to emit visible fugitive particulate emissions are less than 10 tons/year. The BAT requirements also do not apply to the stack particulate emissions because the controlled potential to emit for particulates is less than 10 tons/year due to the limitations contained in 40 CFR Part 63 Subpart N and the use of the packed bed scrubbers.

- c. The permittee, using a chemical fume suppressant containing a wetting agent, shall not allow the surface tension of the decorative chromium electroplating or anodizing bath(s), P007, to exceed 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter ( $2.4 \times 10^{-3}$  pound-force/foot) as measured by a tensiometer at any time during tank operation. This limitation also applies during startup and shutdown operations, but not during periods of malfunction where work practice standards address and correct any malfunction event.

## c) Operational Restrictions

- (1) The permittee shall implement the following operational, maintenance, and work practices standards for the chromium electroplating and anodizing tanks:
  - a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the chromium electroplating or anodizing tank(s), including the associated air pollution control device(s) and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.
  - b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

- c. Determination of whether acceptable operation and maintenance procedures are being used shall be based on the facility records, which shall be made available to the regulating agency (Cleveland Division of Air Quality (Cleveland DAQ)) upon request, and which may include, but not be limited to: monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the regulating agency may require that the permittee make changes to the operation and maintenance plan if that plan:
    - i. does not address a malfunction that has occurred;
    - ii. fails to provide for the proper 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 practices; or
    - iii. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment, and/or monitoring equipment as quickly as practicable.
  - d. The standards and limitations that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.
- (2) The permittee shall utilize an operation and maintenance plan for this emissions unit. 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, 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 plan shall incorporate the work practice standards for the add-on air pollution control device and monitoring equipment required to demonstrate compliance with the standard.
  - c. The 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 device(s), and process and control system monitoring equipment, and for implementing corrective actions to address any malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include

procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.

- 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 by phone to the regulating agency (Cleveland DAQ) within 2 working days following the actions performed inconsistent with the plan. This verbal report shall be followed by a letter within 7 working days following the event, unless the permittee makes alternative reporting arrangements, in advance, with the regulating agency.
  - g. The permittee shall maintain the written operation and maintenance plan on record at the facility; and it shall be made readily available for inspection, at the request of the regulating agency and for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall maintain previous versions of the plan at the facility for a period of five years following each revision; the superseded version(s) of the plan shall also be made available for inspection, if so requested by the regulating agency.
  - 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 of 40 CFR 63.342(f)(3).
- (3) The operation and maintenance plan shall incorporate the following work practice standards for the packed-bed scrubber(s) control:
- a. quarterly visual inspections of the packed-bed scrubber(s) to ensure there is proper drainage, no chromic acid buildup on the packed beds, and no evidence of chemical attack on the structural integrity of the device;
  - b. quarterly visual inspections of the back portion of the chevron blade mist eliminator(s) to ensure that it is dry and there is no breakthrough of chromic acid mist;
  - c. quarterly visual inspections of the ductwork from the tank to the packed-bed scrubber(s) to ensure there are no leaks; and
  - d. adding fresh makeup water to the top of the packed bed(s). If greater than 50 percent of the scrubber water is drained (e.g., for maintenance purposes), makeup water may be added to the scrubber basin.
- (4) The operation and maintenance plan shall incorporate the maintenance and operational practices recommended by the manufacturer of the stalagmometer or tensiometer, which shall be used to measure surface tension of the electroplating or anodizing bath. Until performance testing is conducted and an alternative parameter limitation is established, the surface tension of the electroplating or anodizing bath shall not to

exceed 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter ( $2.4 \times 10^{-3}$  pound-force/foot) as measured by a tensiometer at any time during tank operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) In addition to fulfilling all record keeping requirements contained in the General Provisions to 40 CFR Part 63, Subpart A, as they apply to the emissions unit, the permittee shall also maintain the following records:
- a. inspection records for the add-on air pollution control device and monitoring equipment, to document that the inspection and maintenance required by the work practice standards contained in this permit have been performed. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
  - b. records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment;
  - c. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment;
  - d. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
  - e. other records, which may take the form of checklists, necessary to demonstrate 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, add-on air pollution control device, or monitoring equipment;
  - j. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment;
  - k. the total process operating time of the emissions unit during the reporting period;

- I. all documentation supporting the notifications and reports as outlined in the Reporting Requirements section of this permit and the general reporting requirements in 40 CFR 63.9 and 40 CFR 63.10, from subpart A; and
- m. records of the date and time that fume suppressants are added to the electroplating or anodizing bath.

All records shall be maintained for a period of five years.

- (2) The permittee shall perform the following monitoring and record keeping requirements in order to demonstrate compliance through the use of the wetting agent or combination wetting agent/foam blanket fume suppressant:
  - a. During the initial performance test, the permittee shall determine the outlet chromium concentration using Method 306 or 306A as required in the Testing Requirements section of this permit, to demonstrate compliance with the emission limitation through the use of a wetting agent or combination wetting agent/foam blanket fume suppressant. The surface tension of the bath, measured as specified in Method 306B (from 40 CFR Part 63, Appendix A of Subpart N), shall be established as the site-specific operating parameter, setting the maximum value as that established during the compliant performance test.
  - b. In lieu of establishing the maximum surface tension during the performance test for chromium emissions, the permittee may instead establish 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter ( $2.4 \times 10^{-3}$  pound-force/foot) as measured by a tensiometer as the maximum surface tension value that corresponds to compliance with the applicable emission limitation using only Method 306B, as allowed per 40 CFR 63.342(c)(1)(iii), (c)(2)(iii) or (d)(2).
  - c. On and after the date on which the initial performance test is or was required to be completed under 40 CFR 63.7, the permittee shall monitor the surface tension of the electroplating or anodizing bath according to the schedule in d)(2)d. below. Operation of the emissions unit at a surface tension less than or equal to the value established during the performance test, or no greater than 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter ( $2.4 \times 10^{-3}$  pound-force/foot) as measured by a tensiometer, if the permittee is using this value as the maximum surface tension value, shall constitute compliance with the standard.
  - d. The surface tension shall be monitored using either a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Appendix A of Subpart N and according to the following schedule:
    - i. Following the compliance date, the surface tension shall be measured once every four hours during tank operation.
    - ii. The time between monitoring can be increased if there have been no exceedances. If there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8

hours of tank operation. Again if there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of surface tension measurements shall be once in every 40 hours of tank operation.

- iii. Once an exceedance has occurred, as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed and a subsequent decrease in frequency shall follow the schedule in d)(2)d.ii. above.
- iv. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in d)(2)d.ii. above.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the surface tension allowable, 45 dynes per centimeter as measured by a stalagmometer or 35 dynes per centimeter as measured by a tensiometer; and
  - b. any exceedance of the visible particulate emissions limitation, 20% opacity as a 3-minute average, except as provided by rule; and
  - c. any deviation from the operation and maintenance plan on record.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (2) The permittee shall submit a Notification of Performance Test or Intent to Test to the Cleveland DAQ at least 60 calendar days before the performance test is scheduled. The permittee shall notify the Cleveland DAQ as soon as practicable if the performance test cannot be conducted as scheduled, and shall specify the date it will be rescheduled (provisions of 40 CFR 63.7(b)(2)).
- (3) The permittee shall report, to the Cleveland DAQ, the results of any performance test conducted within 30 days of completion of such test. Reports of performance test results shall also be submitted in the Notification of Compliance Status Report, no later than 90 days following the completion of the performance test. Performance test results shall be documented in complete test reports that contain the following information:
  - a. a brief description of the process;
  - b. a description of the sampling location(s);
  - c. a description of sampling and analytical procedures and any modifications to standard procedures;

- d. the test results;
- e. quality assurance procedures and results;
- f. records of operating conditions during testing, preparation of standards, and calibration procedures;
- g. raw data sheets for field sampling and field and laboratory analyses;
- h. documentation of calculations; and
- i. any other information required by the test method.

The permittee shall have sufficient data to establish the operating parameter value(s) that corresponds to compliance as required for continuous compliance monitoring.

- (4) The permittee shall submit a Notification of Compliance Status Report to the Cleveland DAQ, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit(s) is/are in compliance. The notification shall include the following information for each chromium electroplating tank subject to the NESHAP:
- a. the applicable emission limitation and the methods that were used to determine compliance with this limitation;
  - b. the surface tension measurement and frequency of each measurement during the reporting period;
  - c. 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;
  - d. the methods that shall be used to determine continuous compliance;
  - e. a description of the air pollution control method(s) used for each emission point;
  - f. a statement that the permittee has completed and maintains an operation and maintenance plan as required by the work practice standards; and
  - g. a statement by the permittee as to whether the emissions unit is in compliance.

The permittee shall have sufficient data to establish the operating parameter value(s) that corresponds to compliance as required for continuous compliance monitoring. Reports of performance test results shall be submitted in the Notification of Compliance Status Report no later than 90 days following the completion of the compliance demonstration. For emissions units not required to complete a performance test in accordance with 40 CFR 63.343(b), the Notification of Compliance Status Report shall be submitted no later than 30 days following the compliance date.

- (5) Unless a more frequent reporting frequency has been determined, the permittee shall prepare and submit semiannual Ongoing Compliance Status Reports to the Cleveland DAQ in order 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. a description of the source, type of process performed, and the air pollution control method and monitoring device(s) that is/are/shall be used to demonstrate continuous compliance;
  - c. an identification of the operating parameter(s) that is/are/shall be monitored for compliance determination;
  - d. the relevant emission limitation for the emissions unit, and the operating parameter value(s), or range of values, established during compliance testing and reported in the notification of compliance status report(s);
  - e. the beginning and ending dates of the reporting period;
  - f. the total operating time of the emissions unit during the reporting period;
  - g. 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;
  - h. 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;
  - i. 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;
  - j. a description of any changes in monitoring, processes, or controls since the last reporting period;
  - k. the date of the report; and
  - l. the name, title, and signature of the responsible official who is certifying the accuracy of the report.

The Ongoing Compliance Status Reports shall be submitted semiannually except when:

- m. the regulating agency has determined that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit; or
- n. the monitoring data collected by the permittee show that the emission limit has been exceeded, in which case quarterly reports shall be submitted.

Once an exceedance is reported, the Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency is submitted and approved, as required in this permit, by the Cleveland DAQ.

- (6) The permittee, if required to submit Ongoing Compliance Status Reports on a quarterly (or more frequent) basis, may request that the reporting frequency be reduced to semiannual if all of the following conditions are met:
  - a. for 1 full year (e.g., 4 quarterly or 12 monthly 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; and
  - c. the permittee submits a request (in writing) for approval from the Cleveland DAQ to reduce the frequency of reporting.

In deciding whether to approve a reduced reporting frequency, the regulating agency may request to review information concerning the facility's entire previous performance history during the 5-year record keeping period prior to the intended change in the reporting frequency, or the record keeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is disapproved, the permittee will be notified in writing within 45 days after receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval shall be automatically granted.

As soon as the monitoring data show that the facility is not in compliance with the relevant emission limit, the frequency of reporting shall revert to quarterly, 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 to semiannual reports.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

- (2) The permittee, using a wetting agent in the electroplating or anodizing bath to inhibit chromium emissions, shall conduct, or have conducted, the following testing in order to demonstrate continuous compliance with the surface tension limitation established in this permit:
- a. Method 306B, Surface Tension Measurement and Record keeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities, shall be used to measure the surface tension of the electroplating and/or anodizing bath.
  - b. The stalagmometer or tensiometer shall be operated such that representative measurements of the surface tension are obtained. The manufacturer's written accuracy specifications or recommendations for operation and calibration of the instrument shall be used to verify the operational status of the equipment.
  - c. A representative from the regulating agency shall be permitted to witness the measurement(s), upon request.

If the permittee accepts a surface tension limit of 45 dynes/cm as measured by a stalagmometer or 35 dynes/cm as measured by a tensiometer and conducts continuous compliance monitoring as required in 40 CFR 63.343(c)(5)(ii) and this permit, by reading and recording the surface tension once every 4 hours for the first 40 hours of tank operation; then once every 8 hours of tank operation for an additional 40 hours of tank operations if there are no exceedances during the first 40 hours; and if there are still no exceedances, the minimum frequency of surface tension monitoring shall be once every 40 hours of tank operation. Once an exceedance occurs, the once every 8 hour frequency resumes, and a reduction of the monitoring frequency shall follow the requirements contained in this permit.

(3) Emissions Limitation:

Visible fugitive particulate emissions shall not exceed 5% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Reference Method 9.

(4) Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20 percent opacity, as a three-minute average. (This limit applies after USEPA approves the SIP per b)(2)a. above.)

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Reference Method 9.

- g) Miscellaneous Requirements
  - (1) PTI 13-04753 was issued on 7/22/2008.