



Environmental Protection Agency

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

10/2/2012

CHRISTINE LUCAS
TOMLINSON INDUSTRIES
13700 BROADWAY AVE
CLEVELAND, OH 44125

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318226096
Permit Number: P0110109
Permit Type: Renewal
County: Cuyahoga

Certified Mail

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	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer 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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, 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: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
TOMLINSON INDUSTRIES**

Facility ID:	1318226096
Permit Number:	P0110109
Permit Type:	Renewal
Issued:	10/2/2012
Effective:	10/2/2012
Expiration:	10/2/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
TOMLINSON INDUSTRIES

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Authorization

Facility ID: 1318226096
Application Number(s): A0044388
Permit Number: P0110109
Permit Description: Renewal PTIO for K001, a paint spray booth with electrostatic spray (PTI 13-709 issued 1/29/81); K002, a paint spray booth with two manual HVLP spray guns (PTI 13-3288 issued 7/23/97); and P006, a decorative nickle and chrome plating line controlled by a packed tower scrubber (PTI 13-2514 modified on 3/25/03).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 10/2/2012
Effective Date: 10/2/2012
Expiration Date: 10/2/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

TOMLINSON INDUSTRIES
13700 BROADWAY AVE
Cleveland, OH 44125

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

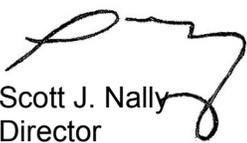
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110109

Permit Description: Renewal PTIO for K001, a paint spray booth with electrostatic spray (PTI 13-709 issued 1/29/81); K002, a paint spray booth with two manual HVLP spray guns (PTI 13-3288 issued 7/23/97); and P006, a decorative nickle and chrome plating line controlled by a packed tower scrubber (PTI 13-2514 modified on 3/25/03).

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

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K001

Paint Spray Booth
P0095420
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K002

Paint Spray Booth-Mod
P0095420
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

P006

Decorative Chrome & Nickel Plating Line
13-02514
Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2 and B.3
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.
3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plating and Polishing Operation Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.
4. The following emissions units contained in this permit to 40 CFR Part 63, Subpart N, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks: P006. The complete NESHAP requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at <http://ecfr.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality (CDAQ).

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart N. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart N (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart N. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart N, and Subpart A.

C. Emissions Unit Terms and Conditions



1. K001, Paint Spray Booth

Operations, Property and/or Equipment Description:

Binks paint spray booth equipped with electrostatic spray and dry filtration system.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #13-709 issued 1/29/81)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	Coating usage limited to 3 gal/day

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11(B) is not applicable.

b. The coating usage for the emissions unit is less than five gallons of coating per day for the spray booth. Therefore, pursuant to OAC rule 3745-17-11(A)(1)(i), this rule does not apply to the above mentioned emission unit.

c) Operational Restrictions

- (1) The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day.
- (2) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- (2) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall include in the annual PER any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
- (3) The permittee shall notify the Cleveland DAQ of any daily record showing that this emissions unit employed more than the applicable maximum daily usage limit. A copy of such record shall be sent to the Cleveland DAQ within forty-five days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Operating Limitation:
Coating usage limited to 3 gals/day
 - Applicable Compliance Method:
Compliance shall be determined by the recordkeeping in d)(1).

- g) Miscellaneous Requirements
 - (1) None.



2. K002, Paint Spray Booth-Mod

Operations, Property and/or Equipment Description:

Paint spray booth with two spray stations and two manual HVLP spray guns for painting modular cabinets and dispensers.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI # 13-3288 issued 7/23/97)	70.9 lbs/day of VOC 12.94 tpy of VOC including cleanup The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	Coating usage limited to 3 gal/day

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11(B) is not applicable.

- b. The coating usage for the emissions unit is less than five gallons of coating per day for the spray booth. Therefore, pursuant to OAC rule 3745-17-11(A)(1)(i), this rule does not apply to the above mentioned emission unit.
- c) **Operational Restrictions**
 - (1) The maximum daily coating usage for this emissions unit shall not exceed 3 gallons per day.
 - (2) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall collect and record the following information on a daily basis for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each cleanup material employed;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (b*d) for all coatings + summation of (b*c) for each cleanup material]
 - (2) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
 - (3) The permittee shall collect and record the annual VOC emissions from all coatings and cleanup material employed (i.e., the sum of the daily VOC emissions for all coatings and cleanup materials recorded in d)(1)e.for the calendar year.)
- e) **Reporting Requirements**
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
 - (2) The permittee shall include the following information in the annual PER :
 - a. the annual amount of emissions including the VOC emissions for both the coating line and clean-up material;

- b. any daily record showing that the dry filtration system was not in service when the emissions unit was in operation; and
 - c. any daily record during which the VOC emissions from the coating and clean-up material exceeded 70.9 lbs of VOC emissions.
- (3) The permittee shall notify the Cleveland DAQ of any daily record showing that this emissions unit employed more than the applicable maximum daily usage limit. A copy of such record shall be sent to the Cleveland DAQ within forty-five days after the exceedance occurs.
- f) Testing Requirements
- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
70.9 lbs/day of VOC

Applicable Compliance Method:
Compliance with the above VOC limitations shall be determined by the recordkeeping requirements in d)(1)e.
 - b. Emission Limitation:
12.94 tpy of VOC

Applicable Compliance Method:
Compliance with the above VOC limitations shall be determined by the recordkeeping in d)(3).
 - c. Operating Limitation:
Coating usage limited to 3 gals/day

Applicable Compliance Method:
Compliance shall be determined by the recordkeeping in d)(1).
- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner of operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
- US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.
- g) Miscellaneous Requirements
- (1) None.



3. P006, Decorative Chrome & Nickel Plating Line

Operations, Property and/or Equipment Description:

Decorative chrome plating line with packed-bed scrubber/composite mesh pad (PBS/CMP) system and using a chemical fume suppressant containing a wetting agent as the primary MACT control option.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Modified PTI #13-02514 issued 3/25/03)	0.000543 tpy of chromium emissions There shall be no visible particulate emissions exhausted from the stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 - Subpart N.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63 Subpart N 40 CFR 63.340 – 63.348	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), P006, to exceed 40 dynes per centimeter (2.8×10^{-3} pound-force/foot) as measured by a stalagmometer 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. See c)(3), c)(4), d)(2)-d)(6), e)(2)-e)(11), and f)(2)-f)(6) below.
e.	40 CFR Part 63 Subpart A 40 CFR 63.1 – 63.16	Appendix containing Table 1 to Subpart N of 40 CFR Part 63 – Applicability of General Provisions to Subpart N shows which parts of the General Provisions in 40 CFR 63.1 – 63.16 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.
- (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.
- (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Cleveland Division of Air Quality, which may include, but is not limited to, monitoring results; review of the operation and

maintenance plan, procedures, and records; and inspection of the emission unit. Based on this information, the Cleveland Division of Air Quality 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 emission units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
 - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
- (4) The permittee shall maintain and implement its operation and maintenance plan. The permittee shall insure that the plan include the following elements during any future revisions:
- 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 O/M plan shall incorporate the following work practice standards:
 - i. visually inspect the device at least once per quarter to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;
 - ii. visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of the chromic acid mist;
 - iii. visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks; and
 - iv. perform wash down of the composite mesh-pads in accordance with the manufacturer's recommendations.
 - c. If a pitot tube is used for monitoring, the O/M plan shall incorporate the following work practice standards to be performed at least once per quarter:
 - i. back flush with water, or remove from the duct and rinse with fresh water;
 - ii. replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained; and
 - iii. check pitot tube ends for damage – replace if cracked or fatigued.

- d. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
 - e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
 - f. 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.
 - g. 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 Cleveland Division of Air Quality.
 - h. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Cleveland Division of Air Quality for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the Cleveland Division of Air Quality for a period of five years after each revision to the plan.
 - i. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The pressure drop across the composite mesh-pad system shall conform to manufacturer's specifications.
 - (2) The permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating.
 - (3) The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.
 - (4) The permittee also shall maintain the following records:

- a. inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
- b. records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment;
- c. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment;
- d. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
- e. other records, which may take the form of checklists, necessary to demonstrate consistence with the provisions of the operation and maintenance plan;
- f. test reports documenting results of all performance tests;
- g. all measurements as may be necessary to determine the conditions of performance tests;
- h. records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected;
- i. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment;
- j. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment;
- k. the total process operating time of the emissions unit during the reporting period;
- l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and 63.9 and 63.10 of 40 CFR Part 63, subpart A;
- m. records of the occurrence, duration, and cause (if known) of any objectionable odors from any exhaust gases;
- n. records of actions taken during the periods of objectionable odors from the exhaust gases;

- a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
 - b. Submittals sent by other methods shall be received by the Cleveland Division of Air Quality on or before the specified date.
- (3) If a performance test is required, the permittee shall submit a Notification of Compliance Status to the Cleveland Division of Air Quality, 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 elements 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 (For emissions units not required to conduct a performance test, the surface tension measurement may fulfill this requirement.);
 - 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 control 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 or operator as to whether the emissions unit is in compliance.
- (4) The permittee shall report to the Cleveland Division of Air Quality 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.
- (5) The permittee shall prepare an ongoing compliance status report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Cleveland Division of Air Quality to document the ongoing compliance status of the emissions unit. This report shall include the following:

- a. the company name and address of the emissions unit;
 - b. an identification of the operating parameter that is monitored for compliance determination;
 - c. the relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section;
 - d. the beginning and ending dates of the reporting period;
 - e. a description of the type of process performed in the emissions unit;
 - 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 name, title, and signature of the responsible official who is certifying the accuracy of the report;
 - l. the date of the report; and
 - m. the report shall be completed annually and retained on site, and made available to the Cleveland Division of Air Quality upon request.
- (6) The permittee shall submit semiannual reports if the total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.

- (7) Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.
- (8) The Cleveland Division of Air Quality may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the emissions unit.
- (9) The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report on site if all of the following conditions are met:
- a. For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emissions limit.
 - b. The permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit.
 - c. The Cleveland Division of Air Quality does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met:
 - i. The permittee notifies the Cleveland Division of Air Quality in writing of its intentions to make such a change. The Division of Air Quality may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. If the permittee's request is disapproved, the Cleveland Division of Air Quality will notify the permittee in writing within 45 days after receiving notice. This notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.
 - ii. If monitoring data show that the emissions unit is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.
- (10) The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the Cleveland Division of Air Quality 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 (decorative chromium electroplating);
 - 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 emissions limits of 40 CFR Part 63, subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.
- (11) If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to the Cleveland Division of Air Quality:
- a. a brief description of the affected emissions unit and the components to be replaced;
 - b. a brief description of the present and proposed emission control technique;
 - c. an estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new emissions unit;
 - d. the estimated life of the affected emissions unit after the replacements; and
 - e. a discussions of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to the Cleveland Division of Air Quality satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.

f) Testing Requirements

(1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

surface tension shall not exceed 40 dynes per centimeter (2.8×10^{-3} pound-force/foot)

Applicable Compliance Method:

Method 306B shall be used to determine the surface tension measurement for decorative chromium electroplating tanks. See d)(3) for frequency of measurement requirements.

b. Emission Limitation:

0.000543 tpy of chromium emissions.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by dividing the grain per dry standard cubic foot emission rate by 7,000 grains per pound and multiplying by the average gas flow rate (197,400 dry standard cubic feet per hour) and multiplying by 8,760 hours of operation per year and dividing by 2,000 pounds per ton.

c. Emission Limitation:

No visible particulate emissions from the exhaust stack.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using USEPA Method 22 of 40 CFR, Part 60, Appendix A.

(2) If required, performance test results shall be documented in complete test reports that contain the following information:

- a. a brief process description;
- b. sampling location description(s);
- c. a description of sampling and analytical procedures and any modifications to standard procedures;
- d. 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.
- (3) The test plan shall be made available to the Cleveland Division of Air Quality prior to testing, if required.
- (4) 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.

- (5) The permittee shall measure the pressure drop across the add-on air pollution control device in accordance with the following guidelines:
- a. 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.
 - iii. On the front side of the first mesh pad and back side of the last mesh pad within the control system.
 - b. 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.
 - ii. Situated such that no air infiltration at the measurement site will occur that could bias the measurement.
 - c. Pressure taps shall be constructed of either polyethylene, polybutylene, or other nonreactive materials.
 - d. Nonreactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop.

- e. Any of the following pressure gauges can be used to monitor pressure drop: a magnehelic gauge, an included manometer, or a "U" tube manometer.
 - f. Prior to connecting any pressure lines to the pressure gauge(s), each gauge shall be zeroed. No calibration of the pressure gauges is required.
- (6) If required, the permittee shall measure the velocity pressure at the inlet to an add-on air pollution control device to establish the site-specific velocity pressure as follows:
- a. Locate a velocity traverse port in a section of straight duct that connects the hooding on the plating tank or tanks with the control device. The port shall be located as close to the control system as possible, and shall be placed a minimum of 2 duct diameters downstream and 0.5 diameter upstream of any flow disturbance such as a bend, expansion, or contraction. If 2.5 diameters of straight duct work does not exist, locate the port 0.8 of the duct diameter downstream and 0.2 of the duct diameter upstream from any flow disturbance.
 - b. A 12-point velocity traverse of the duct to the control device shall be conducted along a single axis according to Method 2 (40 CFR part 60, appendix A) using an S-type pilot tube measurement of the barometric pressure and duct temperature at each traverse point is not required, but is suggested. Mark the S-type pilot tube as specified in Method 1 (40 CFR part 60, appendix A) with 12 points. Measure the velocity pressure (Δp) values for the velocity points and record. Determine the square root of the individual velocity point Δp values and average. The point with the square root value that comes closest to the average square root value is the point of average velocity. The Δp value measured for this point during the performance test will be used as the reference for future monitoring.
- g) Miscellaneous Requirements
- (1) None.