



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

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

Re: Permit to Install
Stark County
Application No: 15-1233
NESHAP

CERTIFIED MAIL

July 17, 1996

OHIO ROLL GRINDING, INC.
DAN GLUTTING
5165 LOUISVILLE ROAD N.E.
LOUISVILLE, OH 44641

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

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

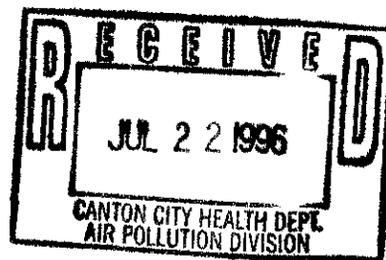
You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
CANTON AIR POLLUTION CONTROL



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



Permit to Install Terms and Conditions

Application No. 15-1233
APS Premise No. 1576001823
Permit Fee: \$800.00

Name of Facility: OHIO ROLL GRINDING, INC.

Person to Contact: DAN GLUTTING

Address: 5165 LOUISVILLE ROAD N.E.
LOUISVILLE, OH 44641

Location of proposed source(s): 5165 LOUISVILLE ROAD N.E.
NIMISHILLEN TWP., OHIO

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

Date of Issuance: July 17, 1996

Effective Date: July 17, 1996

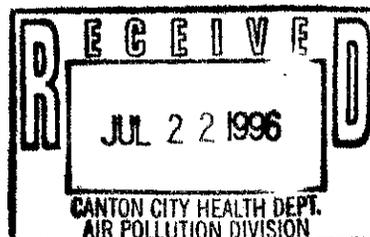
The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R. Scheyardus

Director



TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

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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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P001	Hard chrome electroplating tank; Tank #01	Compliance with MACT 40 CFR Part 63 Subpart N; packed-bed wet scrubber	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 63 Subpart N	.03 mg Cr/DSCM .0005 lb Cr/hr .002 lb PM/hr .0022 ton Cr/yr .0088 ton PM/yr
P002	Hard chrome electroplating tank; Tank #02	Compliance with MACT 40 CFR Part 63 Subpart N; packed-bed wet scrubber	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 63 Subpart N	.03 mg Cr/DSCM .0006 lb Cr/hr .0024 lb PM/hr .00264 ton Cr/yr .0106 ton PM/yr
P003	Hard chrome electroplating tank; Tank #03	Compliance with MACT 40 CFR Part 63 Subpart N; packed-bed wet scrubber	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 63 Subpart N	.03 mg Cr/DSCM .0004 lb Cr/hr .0016 lb PM/hr .00176 ton Cr/yr .007 ton PM/yr

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Chromium	.0066
PM	.0264

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records

shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

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

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Control Measures and/or Usage Requirements:

This emissions units shall be equipped with packed-bed scrubbers.

B. Operational and/or Production Limitations:

The maximum flow rate through the packed-bed scrubbers servicing these emissions units shall be the following:

1. P001 - 5000 ACFM
2. P002 - 6000 ACFM
3. P003 - 4000 ACFM

C. Performance Test Requirements:

Performance tests shall be conducted on the scrubbers servicing these three emissions units, using the methods and procedures in section 63.344 of Subpart N and in section 63.7 of Subpart A. Test results shall be documented in reports containing the information required by 63.344(a)(1) through (a)(9). Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests.

The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

1. A completed Intent to Test form shall be submitted to Canton Division of Air Pollution Control. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
3. These tests shall be conducted before July 24, 1997.
4. Tests shall include a determination of the uncontrolled mass rate of emissions.

D. Provisions For New and Reconstructed Sources:

This facility shall comply with section 63.5(a), (b)(1), (b)(5), (b)(6), and (f)(1) of Subpart A, as well as the provisions of section 63.345 of Subpart N.

E. Work Practices Requirements:

1. At all time, including periods of startup, shutdown, and malfunction, any affected source must be operated and maintained consistent with the Operation and Maintenance Plan (O&M). Affected sources include associated Air Pollution Control devices and monitoring equipment.
2. Malfunctions shall be corrected as soon as practicable and in accordance with the O&M.
3. If found to be deficient, the O&M shall be revised to the satisfaction of the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue N., Canton, Ohio 44702.

4. The prepared O&M shall be implemented no later than the compliance date and shall include all the applicable elements listed in 63.342(f)(3)(i). If applicable, the O&M shall be incorporated into the Title V Permit.
5. The O&M shall be revised if it fails to adequately address a malfunction event within 45 days of its occurrence. If the actions taken during the periods of malfunction were not those specified in the O&M, the owner/operator shall record the alternate actions taken and report them to the Administrator and Canton City Health Department, APC within 2 working days after commencing these actions. The report shall be followed by a letter, within 7 working days after the end of the event unless the owner/operator makes alternative reporting arrangements, in advance with Canton City Health Department, APC.
6. The O&M shall be retained, to be available for inspection, for the life of the affected source or until it is no longer subject to this rule. If the O&M is revised, the superseded versions shall be maintained for inspection for 5 years after each revision to the plan.
7. The standards 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.
8. The facility shall comply with the recordkeeping and reporting requirements associated with the O&M as identified in 63.346(b) and 63.347(g) respectively.

F. Compliance Date Requirement:

This facility shall comply with the applicable sections of 40 CFR Part 63, Subpart N no later than January 25, 1997.

G. Monitoring and Recordkeeping:

1. This facility shall comply with the requirements of Section 63.343(c)(2) of Subpart N when using a packed-bed scrubber system.
2. Inspection records for the double packed-bed wet scrubber documenting device inspected, date of inspection, brief description of working condition of device during inspection, any deficiency and if applicable the corrective action taken. These records shall be kept at the facility for five years.
3. Records of the actual rectifier capacity of the hard chromium electroplating tank detailing daily and yearly values in ampere-hours be kept at the facility for five years.

4. This facility shall fulfill all applicable recordkeeping requirements of Subpart A as well as maintain all the applicable records/documents listed in section 63.346(b) of subpart N. All records shall be maintained for 5 years.

H. 60 Million Ampere-Hours Compliance:

These emissions units are currently located at a large, hard chromium electroplating facility. This means that this facility currently performs hard chromium electroplating and has a maximum cumulative potential rectifier capacity greater than or equal to 60 Million Ampere-Hours per year (AMP-HR/YR). Maximum cumulative potential rectifier capacity means the summation of the total installed rectifier capacity associated with the hard chromium electroplating tanks at a facility, expressed in Amperes multiplied by the maximum potential operating schedule of 8,400 hours per year and 0.7, which assumes that electrodes are energized 70 percent of the total operating time. The maximum potential operating schedule is based on operating 24 hours per day, 7 days per week, 50 weeks per year.

This facility has decided to demonstrate that it should be considered small (maximum cumulative potential rectifier capacity less than 60 Million AMP-HR/YR) instead of large by using nonresettable Ampere-HR meters on all of the tanks located at the facility and keeping monthly records to show that the actual rectifier capacity (based on the facility's actual operating schedule and tank utilization) is below the 60 Million AMP-HR/YR limit.

I. Reporting Requirements:

1. This permittee shall comply with all applicable requirements of Subpart A as well as those described in section 63.347(c) of subpart N, Initial Notification Reports; section 63.347(d) of subpart N, Notification of Performance Test; section 63.347(e) of subpart N, Notification of Compliance Status; section 63.347(f) of subpart N, Reports of Performance Test Results; section 63.347(g) of subpart N, Ongoing Compliance Status Reports for Major Sources; section 63.347(h) of subpart N, Ongoing Compliance Status Reports for Area Sources; and section 63.347(i) of subpart N, Reports Associated with Trivalent Chromium Baths.
2. This permittee shall notify the Canton City Health Department APC within 30 days of any exceedance of the 60 million amp-hr/yr consumption limitation for all hard chrome tanks at this facility.