



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

11/7/2012

Terry Taylor
 Wright Tool Company
 P.O. Box 512
 Barberton, OH 44203

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
 Facility ID: 1677020014
 Permit Number: P0111490
 Permit Type: Renewal
 County: Summit

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
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 Ohio Environmental Protection Agency (EPA) 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. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO 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
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

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. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)3752480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Wright Tool Company**

Facility ID:	1677020014
Permit Number:	P0111490
Permit Type:	Renewal
Issued:	11/7/2012
Effective:	11/7/2012
Expiration:	11/7/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
Wright Tool Company

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. P001, Nickel and Chrome Plating Line.....	11



Final Permit-to-Install and Operate
Wright Tool Company
Permit Number: P0111490
Facility ID: 1677020014
Effective Date: 11/7/2012

Authorization

Facility ID: 1677020014
Application Number(s): A0045321
Permit Number: P0111490
Permit Description: PTIO Renewal for a decorative chrome plating line using a chemical fume suppressant to control emissions.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1 1/7/2012
Effective Date: 11/7/2012
Expiration Date: 11/7/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Wright Tool Company
1 Wright Drive
Barberton, OH 44203

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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



Final Permit-to-Install and Operate

Wright Tool Company

Permit Number: P0111490

Facility ID: 1677020014

Effective Date: 11/7/2012

Authorization (continued)

Permit Number: P0111490

Permit Description: PTIO Renewal for a decorative chrome plating line using a chemical fume suppressant to control emissions.

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

Emissions Unit ID:

P001

Company Equipment ID:

Nickel and Chrome Plating Line for Decorative Chrome Plating

Superseded Permit Number:

P0103104

General Permit Category and Type:

Not Applicable



Final Permit-to-Install and Operate
Wright Tool Company
Permit Number: P0111490
Facility ID: 1677020014
Effective Date: 11/7/2012

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 Akron Regional Air Quality Management District 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.



Final Permit-to-Install and Operate
Wright Tool Company
Permit Number: P0111490
Facility ID: 1677020014
Effective Date: 11/7/2012

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Wright Tool Company

Permit Number: P0111490

Facility ID: 1677020014

Effective Date: 11/7/2012

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) None.



Final Permit-to-Install and Operate
Wright Tool Company
Permit Number: P0111490
Facility ID: 1677020014
Effective Date: 11/7/2012

C. Emissions Unit Terms and Conditions



1. P001, Nickel and Chrome Plating Line

Operations, Property and/or Equipment Description:

Decorative chromium electroplating line (emissions are controlled by a chemical fume suppressant).

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)	Exempt. See b)(2)a.
b.	OAC rule 3745-17-11(B)(1)	See b)(2)b.
c.	40 CFR Part 63, Subpart N (40 CFR 63.340-348)	[40 CFR 63.342(d)(3) and (4)] See b)(2)c. through b)(2)f., c)(1) through c)(3).
d.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 1 to Subpart N of Part 63 lists the applicable General Provisions to Subpart N.

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-31-05(A)(3)(a)(i), Best Available Technology (BAT) is not required because this emissions unit was installed before January 1, 1974.

b. The requirements of OAC rule 3745-17-11 are less stringent than the requirements of 40 CFR Part 63, Subpart N.



- c. In accordance with 40 CFR 63.3409(a), this emissions unit is an existing chromium electroplating tank using a chemical fume suppressant containing a wetting agent to inhibit chromium emissions at a facility performing decorative chromium electroplating, and is subject to the emissions limitations and control measures specified in this section.
 - d. Before September 19, 2014, 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), to exceed 45 dynes per centimeter (3.1×10^{-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.
 - e. On and after September 19, 2014, 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), 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.
 - f. After September 21, 2015, the permittee shall not add perfluorooctane sulfonic acid (PFOS)-based fume suppressants to any affected decorative chromium electroplating tank or chromium anodizing tank.
- 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 this emissions unit, including associated air pollution control devices and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved.
 - b. Malfunctions shall be corrected as soon as practicable after their occurrence.
 - c. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator (appropriate Ohio EPA District Office or Local Air Agency) which may include, but is not limited to, monitoring results, review of the operation and maintenance plan, procedures, records, and inspection of the source. Based on this information, the regulating agency may require that the permittee make changes to the operation and maintenance plan if that the 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 control practices; or
 - iii. Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
 - d. 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.
- (2) The permittee shall prepare an operation and maintenance plan to be implemented no later than the compliance date for this emissions unit. The plan shall include the following elements:
- a. The plan shall specify the operation and maintenance criteria for the emissions unit, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
 - b. The plan shall incorporate the maintenance and operational practices recommended by the manufacturer of the stalagmometer, which shall be used to measure surface tension of the electroplating or anodizing bath, as specified in Table 1 of 40 CFR 63.342;
 - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
 - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions; and
 - e. The plan shall include the following housekeeping procedures, as specified in Table 2 of 40 CFR 63.342:
 - i. For any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium, the permittee shall (a) store the substance in a closed container in an enclosed storage area or building at all times, except when transferring the substance to and from the container; AND (b) use a closed container when transporting the substance from the enclosed storage area whenever transporting substance, except when transferring the substance to and from the container.
 - ii. For each affected tank, to minimize spills of bath solution that result from dragout, the permittee shall (a) install drip trays that collect and return to



the tank any bath solution that drips or drains from parts as the parts are removed from the tank prior to operating the tank; OR (b) contain and return to the tank any bath solution that drains or drips from parts as the parts are removed from the tank whenever removing parts from the tank; OR (c) collect and treat in an onsite wastewater treatment plant any bath solution that drains or drips from parts as the parts are removed from the tank whenever parts are removed from the tank.

Note: this measure does not require the return of contaminated bath solution to the tank. This requirement applies only as the parts are removed from the tank.

- iii. For each spraying operation for removing excess chromic acid from parts removed from, and occurring over, an affected tank, the permittee shall install a splash guard to minimize overspray during spraying operations and to ensure that any hexavalent chromium laden liquid captured by the splash guard is returned to the affected chromium electroplating or anodizing tank prior to any such spraying operation.
- iv. For each operation that involves the handling or use of any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium, the permittee shall begin clean up, or otherwise contain, all spills of the substance within one hour of the spill.

Note: substances that fall or flow into drip trays, pans, sumps, or other containment areas are not considered spills.

- v. For surfaces within the enclosed storage area, open floor area, walkways around affected tanks contaminated with hexavalent chromium from an affected chromium electroplating or chromium anodizing tank, the permittee shall (a) clean the surfaces using one or more of the following methods: HEPA vacuuming, hand-wiping with a damp cloth, wet mopping, hose down or rinse with potable water that is collected in a wastewater collection system, or other cleaning method approved by the permitting authority, at least once every 7 days if one or more chromium electroplating or chromium anodizing tanks were used, or at least after every 40 hours of operating time of one or more affected chromium electroplating or chromium anodizing tank, whichever is later; OR (b) apply a non-toxic chemical dust suppressant to the surfaces according to manufacturer's recommendations.
- vi. For all buffing, grinding, or polishing operations that are located in the same room as chromium electroplating or chromium anodizing operations, the permittee shall separate the operation from any affected electroplating or anodizing operation by installing a physical barrier (the barrier may take the form of plastic strip curtains) prior to beginning the buffing, grinding, or polishing operation.
- vii. For all chromium or chromium-containing wastes generated from housekeeping activities, the permittee shall store, dispose, recover, or



recycle the wastes using practices that do not lead to fugitive dust and in accordance with hazardous waste requirements at all times.

The permittee shall comply with housekeeping procedures specified in Table 2 of 40 CFR 63.342 after March 19, 2013.

- 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. 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.
 - 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 by phone such actions within two working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the appropriate Ohio EPA District Office or Local Air Agency.
 - 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 Ohio EPA District Office or Local Air Agency for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR Part 63, Subpart N. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the regulating agency 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, provided the alternative plans meet the requirements of this section.
- (3) Until performance testing is conducted and an alternative parameter limitation is established, the surface tension of the electroplating or anodizing bath shall not exceed:
- a. 45 dynes/cm (3.1×10^{-3} lbf/ft) as measured by a stalagmometer at any time during tank operation, if before September 19, 2014; or
 - b. 40 dynes/cm (2.8×10^{-3} lbf/ft) as measured by a stalagmometer at any time during tank operation, if on or after September 19, 2014.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall perform the following monitoring and record keeping requirements in order to demonstrate compliance through the use of a chemical fume suppressant containing a wetting agent:



- a. During the initial performance test, the permittee shall determine the outlet chromium concentration using Method 306 or 306A, Appendix A to Part 63, to demonstrate compliance with the emission limitation through the use of a chemical fume suppressant containing a wetting agent. The surface tension of the bath, measured as specified in Method 306B, Appendix A to 40 CFR Part 63, 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 a performance test for chromium emissions, the permittee may accept the following maximum surface tension values that correspond to compliance with the applicable emission limitation, as allowed per 40 CFR 63.343(c)(5):
 - i. 45 dynes/cm (3.1×10^{-3} lbf/ft) as measured by a stalagmometer, if before September 19, 2014; or
 - ii. 40 dynes/cm (2.8×10^{-3} lbf/ft) as measured by a stalagmometer, if on or after September 19, 2014.
- c. On and after the date on which the initial performance test is required to be completed, the permittee shall monitor the surface tension of the electroplating or anodizing bath. Operation of this emissions unit at a surface tension less than or equal to the maximum surface tension in specified in d)(1)b. shall constitute compliance with the standard.
- d. The surface tension shall be monitored according to the following schedule, using a stalagmometer, as specified in Method 306B, "Surface Tension Measurement and Record keeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities," Appendix A to 40 CFR Part 63:
 - i. Following the compliance date, the surface tension shall be measured once every 4 hours during operation of the tank.
 - ii. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation on this schedule, 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 monitoring allowed is once every 40 hours of tank operation.
 - iii. Once an exceedance occurs, as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule in paragraph (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 4 hours must be resumed, with a decrease in monitoring frequency allowed as in paragraph (ii) above.
- (2) All monitoring equipment shall be operated such that representative measurements of process parameters from the 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.
- (3) 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 monitoring equipment to document that the inspection and maintenance required by the work practice standards have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
 - b. Records of all maintenance performed on the emissions unit, the add-on air pollution control device, and monitoring equipment, except routine housekeeping practices;
 - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
 - d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
 - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan;
 - f. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected;
 - g. 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, or monitoring equipment;
 - h. 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, or monitoring equipment;



- i. The total process operating time of the emissions unit during the reporting period;
- j. Records of the date and time that fume suppressants are added to the electroplating or anodizing bath, and records of the fume suppressant manufacturer and product name; and
- k. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and 40 CFR Part 63, Subpart A.

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

e) Reporting Requirements

(1) The permittee shall fulfill all applicable reporting requirements outlined in 40 CFR Part 63, Subparts A and N. These reports shall be made to the Administrator or to the delegated State authority (appropriate Ohio EPA District Office or Local Air Agency).

a. Reports required by this permit may be sent by U.S. mail, fax, or by another courier.

i. Submittals sent by U.S. mail shall be postmarked on or before the specified date.

ii. Submittals sent by other methods shall be received by the regulating agency on or before the specified date.

b. Reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the appropriate Ohio EPA District Office or Local Air Agency in writing that the source is subject to 40 CFR Part 63, Subpart N. The initial notification shall be submitted no later than July 24, 1995, and shall contain the following information:

a. The name, title, and address of the owner or operator;

b. The address (i.e., physical location) of each affected source;

c. A statement that 40 CFR Part 63, Subpart N is the basis for this notification;

d. Identification of the applicable emission limitation and compliance date for each emissions unit;

e. A brief description of each emissions unit, including the type of process operation performed; and

f. A statement of whether the emissions unit is located at a major source or an area source.



- (3) The permittee shall submit a notification of compliance status to the appropriate Ohio EPA District Office or Local Air Agency, no later than 30-days after the compliance date, each time that an emissions unit becomes subject to the requirements of 40 CFR Part 63, Subpart N. The notification shall list for each emissions unit:
- a. The applicable emission limitation and the methods that were used to determine compliance with this limitation;
 - b. The surface tension measurement;
 - c. The specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;
 - d. The methods that will be used to determine continuous compliance;
 - e. A description of the air pollution control technique for each emission point;
 - f. A statement that the permittee has completed, and has on file, the operation and maintenance plan as required by the work practice standards; and
 - g. A statement as to whether the emissions unit has complied with the provisions of 40 CFR Part 63, Subpart N.
- (4) The permittee, qualifying as an area source, shall prepare a summary report to document the ongoing compliance status of the emissions unit. This report shall be completed annually, retained on site, and be made available to the appropriate Ohio EPA District Office or Local Air Agency upon request. The ongoing compliance status report shall include the following information:
- 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;
 - 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 source 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 were followed in accordance with the operation and maintenance plan;
 - i. If the operation and maintenance plan 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 report(s) documenting that the operation and maintenance plan was not followed;
 - j. A description of any changes in monitoring, processes, or controls since the last reporting period;
 - k. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an emissions unit to minimize emissions, including actions taken to correct a malfunction.
 - l. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
 - m. The date of the report.
- (5) The permittee shall prepare and submit semiannual reports to the appropriate Ohio EPA District Office or Local Air Agency if either of the following conditions are met:
- a. The total duration of excess emissions (as indicated by the monitoring data collected by the permittee) is one percent or greater of the total operating time for the reporting period; or
 - b. The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent or greater of the total operating time.

Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.

The Ohio EPA District Office or Local Air Agency 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 source.

- (6) If the permittee 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, he or she may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report onsite if all of the following conditions are met:
- a. For one full year (e.g., two semiannual or four quarterly reporting periods), the ongoing compliance status reports demonstrate that the emissions unit is in compliance with the relevant emission limit;



- b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63 Subparts A and N; and
- c. The regulating agency does not object to a reduced reporting frequency for the emissions unit.

The frequency of submitting ongoing compliance status reports may be reduced only after the permittee notifies the appropriate Ohio EPA District Office or Local Air Agency in writing of his or her intention to make such a change, and the regulating agency does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the Ohio EPA District Office or Local Air Agency may review information concerning the emissions unit's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. Such information may be used by the regulating agency to make a judgement about the emissions unit's potential for noncompliance in the future. If the Ohio EPA District Office or Local Air Agency disapproves the permittee's request to reduce reporting frequency, the regulating agency will notify the permittee 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 is automatically granted.

As soon as monitoring data shows 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 from the appropriate Ohio EPA District Office or Local Air Agency to reduce the reporting frequency.

- (7) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Control Requirement:

Before September 19, 2014, the surface tension of the electroplating or anodizing bath contained within the affected tank shall not exceed 45 dynes/cm (3.1×10^{-3} lbf/ft) as measured by a stalagmometer.

On and After September 19, 2014, the surface tension of the electroplating or anodizing bath contained within the affected tank shall not exceed 40 dynes/cm (2.8×10^{-3} lbf/ft) as measured by a stalagmometer.

Applicable Compliance Method:

Compliance with the applicable surface tension requirement identified above shall be demonstrated by the monitoring and record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.