



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

11/8/2012

Genevieve Damico *Via E-Mail Notification*  
United States Environmental Protection Agency  
Mail Code: AR-18J  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT  
Facility Name: Manufacturers Plating Company, Inc.  
Facility ID: 1318000838  
Permit Type: Renewal  
Permit Number: P0094298

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Cleveland Division of Air Quality





## **PROPOSED**

**Division of Air Pollution Control  
Title V Permit  
for  
Manufacturers Plating Company, Inc.**

Facility ID:	1318000838
Permit Number:	P0094298
Permit Type:	Renewal
Issued:	11/8/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Manufacturers Plating Company, Inc.

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**Proposed Title V Permit**  
Manufacturers Plating Company, Inc.  
**Permit Number:** P0094298  
**Facility ID:** 1318000838  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1318000838  
Facility Description: Plastic part decorative chrome plating operation.  
Application Number(s): A0025789, A0025790, A0025791, A0042354  
Permit Number: P0094298  
Permit Description: Title V renewal permit for solvent cleaner (L002), chromium plating (P002, P005, P006, and P007), and paint mask washing (P008).  
Permit Type: Renewal  
Issue Date: 11/8/2012  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0094297

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Cleveland Division of Air Quality. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



**Proposed Title V Permit**  
Manufacturers Plating Company, Inc.  
**Permit Number:** P0094298  
**Facility ID:** 1318000838  
**Effective Date:** To be entered upon final issuance

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



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

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive



measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Cleveland Division of Air Quality.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **5. Title IV Provisions**

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

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*



### 13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. An identification of each term or condition of this permit that is the basis of the certification.



- b. The permittee's current compliance status.
  - c. Whether compliance was continuous or intermittent.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*



## **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

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

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of



a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following emissions units contained in this permit are subject 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: P002, P005, P006, and P007. 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 (Cleveland DAQ).

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.

3. The following emissions unit contained in the in this permit is subject to 40 CFR Part 63, Subpart T, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning: L002. 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 DAQ.

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart T. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart T (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart T. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart T, and Subpart A.



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



**1. L002, Vapor Degreaser #1**

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

Trichloroethylene open top vapor degreaser for parts cleaning

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI# 13-02667 issued on 3/31/1993	Volatile organic compound (VOC) emissions shall not exceed 5.25 lbs/hr and 23.0 TPY.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart T.
b.	40 CFR Part 63, Subpart T (40 CFR 63.463)	See b)(2) below.
c.	OAC rule 3745-21-09(O)	In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(3) shall not apply to this emissions unit.

(2) Additional Terms and Conditions

a. The permittee shall ensure that the chilled air blanket temperature (in degrees F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.



- b. The permittee shall comply with the following requirements:
    - i. Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket as described in the "Testing Requirements" section of this permit.
    - ii. Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.
  - c. The permittee shall reduce room draft to ensure that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
  - d. The solvent cleaning machine shall have a freeboard ratio of 0.75 or greater.
  - e. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - f. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
  - g. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
  - h. The solvent cleaning machine shall have a primary condenser.
- c) Operational Restrictions
- (1) The permittee shall meet all of the following required work and operational practices:
    - a. The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.
    - b. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).



- c. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Cleveland Division of Air Quality (Cleveland DAQ).
- d. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
- e. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
- f. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- g. When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- h. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Cleveland DAQ to achieve the same or better results as those recommended by the manufacturer.
- i. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Cleveland DAQ.
- j. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
- k. Sponges, fabric, wood, and paper products shall not be cleaned.

[Authority for term: 40 CFR 63.463(d)(2) through 40 CFR 63.463(d)(12); OAC rule 3745-77-07(A)(3); PTI# 13-02667]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall monitor the hoist speed as described below:
  - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.



- c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
- d. If the permittee can demonstrate to the satisfaction of the Cleveland DAQ in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

[Authority for term: 40 CFR 63.466(c); OAC rule 3745-77-07(A)(3); PTI# 13-02667]

- (2) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:

- a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
- b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
- c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
- d. Records of the tests required as outlined in the "Testing Requirements" section of this permit to determine an appropriate dwell time for each part or parts basket.

[Authority for term: 40 CFR 63.467(a); OAC rule 3745-77-07(A)(3) ]

- (3) The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:

- a. The results of control device monitoring required in this section of the permit.
- b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
- c. Estimates of annual trichloroethylene consumption for the solvent cleaning machine.

- (4) The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

[Authority for term: 40 CFR 63.463(e); OAC rule 3745-77-07(A)(3) ]



- (5) The permittee shall conduct an initial monitoring test of the wind speed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:
- a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:
    - i. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
    - ii. Orient a velometer in the direction of the wind current at each of the four corners of the machine.
    - iii. Record the reading for each corner.
    - iv. Average the values obtained at each corner and record the average wind speed.
  - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

[Authority for term: 40 CFR 63.466(d); OAC rule 3745-77-07(A)(3) ]

- (6) The permittee shall determine the appropriate dwell time for each part or parts basket using the following procedures:
- a. Determine the amount of time for the part or parts basket to cease dripping once placed in the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.
  - b. The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in d)(1)a.

[Authority for term: 40 CFR 63.465(d); OAC rule 3745-77-07(A)(3) ]

e) Reporting Requirements

- (1) The permittee shall submit an annual report by February 1 of each year and shall cover the previous calendar year. Each annual report shall be submitted to the Cleveland DAQ and shall contain the following:
- a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463 (d) (10)."
  - b. An estimate of solvent consumption during the reporting period.



- c. The size (solvent/air interface area) and the type of the solvent cleaning machine.

[Authority for term: 40 CFR 63.468(f); OAC rule 3745-77-07(A)(3) ]

- (2) The permittee shall submit an exceedance report on a semiannual basis to the Cleveland DAQ.

- a. Each exceedance report shall be delivered or post marked by January 31st and July 31st of each year and shall contain the following information for the previous reporting period:

- i. Information on the action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

- ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

- iii. If no exceedance has occurred, a statement to that effect shall be submitted.

- b. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection, or if no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection, or if the cover did not completely cover the cleaning machine openings when in place whenever parts were not in the solvent cleaning machine and/or if the cover had cracks, holes or other defects and no correction was made within 15 days of detection the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Cleveland DAQ.

- c. The permittee may receive approval of less frequent reporting if the following conditions are met:

- i. the emissions unit has demonstrated a full year of compliance without an exceedance;

- ii. the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions; and



- iii. the Cleveland DAQ does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions.

[Authority for term: 40 CFR 63.468(h); 40 CFR 63.468(i); OAC rule 3745-77-07(A)(3) ]

f) Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 5.25 lbs/hr

Applicable Compliance Method:

Compliance shall be determined by dividing the actual annual emissions determined in f)(1)b. by the annual hours of operation.

- b. Emission Limitation:

VOC (trichloroethylene) emissions shall not exceed 23 tons per year

Applicable Compliance Method:

To determine the annual volatile organic compound emission rate, the following equation shall be used:

$$E = [(Ls - Lw) \times D] / 2000$$

Where:

E = Volatile organic compound emission rate in tons per year

Ls = Liquid volume of cleaning solvent employed each year (gallons)

Lw = Liquid volume of cleaning solvent sent off-site as waste (gallons)

D = Density of cleaning solvent (pounds/gallon).

[Authority for term: OAC Rule(s): 3745-31-05(A)(3); OAC rule 3745-77-07(A)(3) ]

- (2) The permittee shall determine the appropriate dwell time for each part or parts basket using the following procedures:

- a. Determine the amount of time for the part or parts basket to cease dripping once placed in the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.



- b. The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in paragraph (2)a. above.

[Authority for term: 40 CFR 63.463(e)(2)(v)(A) and (B); OAC rule 3745-77-07(A)(3)]

- (3) The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

- a. Determine the potential to emit for each individual solvent cleaning machine using the following equations and sum the result(s):

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

$PTE_i$  = the potential to emit for the solvent cleaning machine  $i$  (kilograms solvent per year).

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year).  
= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour).  
= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.  
= 1.12 kilograms per square meter per hour for in-line cleaning machines.

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in f)(3)b. below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

$SAI$  = the solvent/air interface area (square meters).

$Vol$  = the cleaning capacity of the solvent cleaning machine (cubic meters).



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- c. Sum the PTEi for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

[Authority for term: 40 CFR 63.465(e); OAC rule 3745-77-07(A)(3) ]

- g) Miscellaneous Requirements

- (1) None.



**2. P002, Udylyte Automatic Chrome Plating Line**

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

Decorative chrome plating line for metal parts

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63 – Subpart N National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	See b)(2)a. below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity from any stack serving this emission unit, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
d.	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63 Subpart N.
e.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation specified in this rule is less stringent than the control measures specified in 40 CFR Part 63 Subpart N.



(2) Additional Terms and Conditions

- a. The permittee shall control chromium emission discharged to the atmosphere by not allowing the surface tension of the electroplating or anodizing bath to exceed 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force per foot) at any time during operation of the tank.

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.

[ Authority for term: 40 CFR 63.342(f)(1)(i); OAC rule 3745-77-07(A)(3) ]

- (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

[ Authority for term: 40 CFR 63.342(f)(1)(ii); OAC rule 3745-77-07(A)(3) ]

- (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 (Cleveland DAQ), 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 DAQ may require that the permittee make changes to the operation and maintenance plan if that plan:

- a. does not address a malfunction that has occurred;
- b. fails to provide for the operation of the emissions unit, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
- c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

[ Authority for term: 40 CFR 63.342(f)(2); OAC rule 3745-77-07(A)(3) ]

- (4) The permittee shall utilize an operation and maintenance plan for this emissions unit. The plan shall include the following elements:

- a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (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. If a stalagmometer is used for monitoring, follow the manufacturer's recommendations.
- c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
- d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
- e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.
- f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Cleveland DAQ.
- g. 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 DAQ for the life of the emission 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 DAQ for a period of five years after each revision to the plan.
- h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

[ Authority for term: 40 CFR 63.342(f)(3); OAC rule 3745-77-07(A)(3) ]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The surface tension shall be monitored according to the following schedule:
  - a. The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Subpart N.
  - b. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every four 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, 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.

- c. Once an exceedance occurs, as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed. A subsequent decrease in frequency shall follow the schedule in d)(1)b. above.
- d. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in d)(1)b. above.

[ Authority for term: 40 CFR 63.344(c)(3); 40 CFR 63.344(d)(3); OAC rule 3745-77-07(A)(3) ]

- (2) The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.

[ Authority for term: 40 CFR 63.346(a); OAC rule 3745-77-07(A)(3) ]

- (3) 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 emission unit during the reporting period.
- l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and section 63.9 and section 63.10 of 40 CFR Part 63, subpart A.
- m. Records of the date and time that fume suppressants are added to the electroplating or anodizing bath.

[ Authority for term: 40 CFR 63.346(b); OAC rule 3745-77-07(A)(3) ]

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

[ Authority for term: 40 CFR 63.346(c); OAC rule 3745-77-07(A)(3) ]

e) Reporting Requirements

- (1) The permittee shall fulfill all reporting requirement as outlined in 40 CFR part 63 subpart A. These reports shall be made to the Cleveland DAQ and shall be sent by U.S. mail, fax or by another courier.

- a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
- b. Submittals sent by other methods shall be received by the Cleveland DAQ on or before the specified date.

[ Authority for term: 40 CFR 63.347(a); OAC rule 3745-77-07(A)(3) ]

- (2) The permittee shall report to the Cleveland DAQ 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.

[ Authority for term: 40 CFR 63.347(d); 40 CFR 63.347(f); OAC rule 3745-77-07(A)(3) ]



- (3) The permittee shall prepare an ongoing compliance status report semiannually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Cleveland DAQ 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. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit 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.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.
  - i. A description of any changes in monitoring, processes, or controls since the last reporting period.
  - j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
  - k. The date of the report.
  - l. The report shall be submitted semiannually except when:
    - i. The Cleveland DAQ determined that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit; or



- ii. The monitoring data collected by the permittee show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once an exceedance is reported, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved.

[ Authority for term: 40 CFR 63.347(g); OAC rule 3745-77-07(A)(3) ]

- (4) The permittee shall submit semiannual reports if the following conditions are met:
  - a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
  - b. 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.

[ Authority for term: 40 CFR 63.347(h)(2)(i); OAC rule 3745-77-07(A)(3) ]

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

[ Authority for term: 40 CFR 63.347(h)(2)(ii); OAC rule 3745-77-07(A)(3) ]

- (6) The Cleveland DAQ 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.

[ Authority for term: 40 CFR 63.347(h)(2)(iii); OAC rule 3745-77-07(A)(3) ]

- (7) 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 emission limit.
- b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit.
- c. The Cleveland DAQ 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 DAQ in writing of its intentions to make such a change. The Cleveland Division of Air Quality may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emission unit's compliance date,



whichever is shorter. 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 DAQ 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.

[Authority for term: 40 CFR 63.347(h)(3); OAC rule 3745-77-07(A)(3)]

- (8) The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the Cleveland DAQ which includes the following:
  - a. The permittee's name, title, and address.
  - b. The address (i.e, physical location) or proposed address of the affected emissions unit if different from the permittee's.
  - c. A notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR Part 63.2.
  - d. An identification of 40 CFR Part 63, subpart N as the basis for the notification.
  - e. The expected commencement and completion dates of the construction or reconstruction.
  - f. The anticipated date of (initial) startup.
  - g. The type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing).
  - h. A description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity if an add-on air pollution control device is used.



- i. An estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR Part 63, subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.

[Authority for term: 40 CFR 63.345; OAC rule 3745-77-07(A)(3)]

- (9) If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to the Cleveland DAQ:

- 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.
- e. A discussion of any economic or technical limitations the emission 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 DAQ satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.

[Authority for term: 40 CFR 63.345; OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

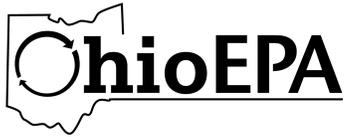
- (1) Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities," shall be used to measure the surface tension of electroplating and anodizing baths.

[ Authority for term: 40 CFR 63.344(c)(3); 40 CFR 63.344(d)(3); OAC rule(s): 3745-77-07(A)(3) and 3745-77-07(C) ]

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

- a. Emission Limitation:

Visible PE shall not exceed 20 percent opacity from any stack serving this emission unit, as a six-minute average, except as provided by rule.



Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

[ Authority for term: OAC rule(s): 3745-17-07(A), 3745-77-07(A)(3), and 3745-77-07(C) ]

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

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

[ Authority for term: OAC rule(s): 3745-17-07(B), 3745-77-07(A)(3), and 3745-77-07(C) ]

g) Miscellaneous Requirements

- (1) None.



**3. P005, Plastics Chrome Plating Line**

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

Plastic Parts Decorative Chrome Plating Line (hexavalent chrome employing chemical fume suppressant w/ wetting agent and Composite Mesh Pad Scrubber (supplemental control). Consists of various tanks (cleaning, etching, chrome plate, and rinse tanks).

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI# 13-03102 issued on 4/28/2005)	Chromium emissions shall not exceed 0.032 TPY.  There shall be no visible particulate emission from the stack serving this emissions unit at any time.  There shall be no visible emissions of fugitive dust from the non-stack egress points at any time.
b.	40 CFR Part 63 – Subpart N National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	See b)(2) below.
c.	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	The visible fugitive dust limitation specified by this rule is less stringent than the visible fugitive dust limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63, Subpart N.
f.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation specified in this rule is less stringent than the control requirements specified in 40 CFR Part 63 Subpart N.

(2) Additional Terms and Conditions

- a. The permittee shall control chromium emissions discharged to the atmosphere by not allowing the surface tension of the electroplating or anodizing bath to exceed 45 dynes per centimeter (3.1x10<sup>-3</sup> pound-force per foot) at any time during operation of the tank.
- b. While both a chemical fume suppressant with wetting agent and a composite mesh pad scrubber are employed, compliance shall be demonstrated on the basis of the chemical fume suppressant with wetting agent requirement as per 40 CFR Part 63, Subpart N.

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.

[ Authority for term: 40 CFR 63.342(f)(1)(i); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

- (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

[ Authority for term: 40 CFR 63.342(f)(1)(ii); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]



- (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 (Cleveland DAQ), 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 DAQ may require that the permittee make changes to the operation and maintenance plan if that plan:
- a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions unit, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
- [ Authority for term: 40 CFR 63.342(f)(2); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]
- (4) The permittee shall prepare an operation and maintenance plan to be implemented no later than July, 1998. The plan shall be incorporated by reference into the Title V permit and include the following elements:
- a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
  - b. If a stalagmometer is used for monitoring, follow the manufacturer's recommendations.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.
  - f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such



actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Cleveland DAQ.

- g. 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 DAQ for the life of the emission 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 DAQ for a period of five years after each revision to the plan.
- h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

[ Authority for term: 40 CFR 63.342(f)(3); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

d) **Monitoring and/or Recordkeeping Requirements**

(1) The surface tension shall be monitored according to the following schedule:

- a. The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Subpart N.
- b. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every four 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, 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.
- c. Once an exceedance occurs, as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed. A subsequent decrease in frequency shall follow the schedule in d)(1)b. above.
- d. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in d)(1)b. above.

[ Authority for term: 40 CFR 63.344(c)(3); 40 CFR 63.344(d)(3); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]



- (2) The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.

[ Authority for term: 40 CFR 63.346(a); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

- (3) 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 emission unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and section 63.9 and section 63.10 of 40 CFR Part 63, subpart A.



- m. Records of the date and time that fume suppressants are added to the electroplating or anodizing bath.

[ Authority for term: 40 CFR 63.346(b); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

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

[ Authority for term: 40 CFR 63.346(c); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

e) Reporting Requirements

- (1) The permittee shall fulfill all reporting requirement as outlined in 40 CFR part 63 subpart A. These reports shall be made to the Cleveland DAQ and shall be sent by U.S. mail, fax or by another courier.

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

- b. Submittals sent by other methods shall be received by the Cleveland DAQ on or before the specified date.

[ Authority for term: 40 CFR 63.347(a); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

- (2) The permittee shall report to the Cleveland DAQ 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.

[ Authority for term: 40 CFR 63.347(d); 40 CFR 63.347(f); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

- (3) The permittee shall prepare an ongoing compliance status report semiannually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Cleveland DAQ 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. The total operating time of the emissions unit during the reporting period.



- f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit 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.
- g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
- h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.
- i. A description of any changes in monitoring, processes, or controls since the last reporting period.
- j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
- k. The date of the report.
- l. The report shall be completed annually and retained on site, and made available to the Cleveland DAQ upon request.

[ Authority for term: 40 CFR 63.347(g); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

- (4) The permittee shall submit semiannual reports if the following conditions are met:
  - a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
  - b. 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.

[ Authority for term: 40 CFR 63.347(h)(2)(i); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

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

[ Authority for term: 40 CFR 63.347(h)(2)(ii); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]



- (6) The Cleveland DAQ 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.

[ Authority for term: 40 CFR 63.347(h)(2)(iii); OAC rule 3745-77-07(A)(3); PTI-03102 ]

- (7) 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 emission limit.
- b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit.
- c. The Cleveland DAQ 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 DAQ in writing of its intentions to make such a change. The Cleveland Division of Air Quality may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emission unit's compliance date, whichever is shorter. 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 DAQ 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.

[ Authority for term: 40 CFR 63.347(h)(3); OAC rule 3745-77-07(A)(3); PTI 13-03102 ]

- (8) The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the Cleveland DAQ which includes the following:



- a. The permittee's name, title, and address.
- b. The address (i.e, physical location) or proposed address of the affected emissions unit if different from the permittee's.
- c. A notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR Part 63.2.
- d. An identification of 40 CFR Part 63, subpart N as the basis for the notification.
- e. The expected commencement and completion dates of the construction or reconstruction.
- f. The anticipated date of (initial) startup.
- g. The type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing).
- h. A description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity if an add-on air pollution control device is used.
- i. An estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR Part 63, subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.

[ Authority for term: 40 CFR 63.345; OAC rule 3745-77-07(A)(3); PTI 13-03102]

- (9) If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to the Cleveland DAQ:

- 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.
- e. A discussion of any economic or technical limitations the emission 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 DAQ satisfaction that the technical or economic limitations affected the emissions unit ability to comply with the relevant standard and how they do so.

[ Authority for term: 40 CFR 63.345; OAC rule 3745-77-07(A)(3); PTI 13-03102]



f) Testing Requirements

- (1) Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities," shall be used to measure the surface tension of electroplating and anodizing baths.

[ Authority for term: 40 CFR 63.344(c)(3); 40 CFR 63.344(d)(3); OAC rule(s): 3745-77-07(A)(3) and 3745-77-07(C); PTI 13-03102 ]

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

a. Emission Limitation:

Chromium emissions shall not exceed 0.032TPY.

Applicable Compliance Method:

The following equation (based on AP-42, "Compilation of Air Pollution Emission Factors" Section 12.20) shall be used"

$$E_a = (E_c \times 100) \times R_c \times (1/7000) \times H_r \times (1/2000)$$

Where:

$E_a$  = actual annual chromium emissions in ton per year;

$E_c$  =  $1.2 \times 10^{-6}$  grains/dscf (emission factor for decorative chromium electroplating with fume suppressant from AP-42, Section 12.20, Table 12.20-1)(7/96);

100 = conversion factor for converting grains/dscf to grains/amp-hr;

$R_c$  = rectifier capacity in amps;

1/7000 = 1 pound per 7000 grains to convert from grains/hr to lbs/hr;

$H_r$  = hours per year of operation of chromium electroplating tank; and

1/2000 = 1 ton per 2000 pounds to convert from lbs/yr to ton/yr.

b. Emission Limitation:

There shall be no visible particulate emissions from the packed bed scrubber stack at any time.



Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed using the methods and procedures specified in USEPA Reference Method 22.

c. Emission Limitation:

There shall be no visible emissions of fugitive dust from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) at any time.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed using the methods and procedures specified in USEPA Reference Method 22.

[ Authority for term: OAC rule 3745-77-07(C); PTI 13-03102]

g) Miscellaneous Requirements

- (1) None.



**4. P006, Satin Trivalent Chrome Plating Line**

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

Decorative chrome plating tank (trivalent chromium electroplating) employing an integrated wetting agent.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI# 13-04068 issued on 9/16/2003)	Emissions of chromium shall not exceed 0.0083 TPY
b.	40 CFR Part 63 – Subpart N National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	See b)(2)a. below.
c.	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20 percent opacity from any stack serving this emission unit, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
e.	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63 Subpart N.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation specified in this rule is less stringent than the control requirements specified in 40 CFR Part 63 Subpart N.

(2) Additional Terms and Conditions

a. The permittee must use a wetting agent that is an ingredient in the trivalent chromium bath as purchased from the vendor or the wetting agent and the trivalent chromium bath components must be purchased from the same vendor.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records:

- a. Records of the bath components purchased with the wetting agent clearly identified as a bath constituent contained in one of the components;
- b. Test reports documenting results of all performance tests.
- c. All measurements as may be necessary to determine the conditions of performance tests.
- d. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
- e. 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.
- f. 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.
- g. The total process operating time of the emission unit during the reporting period.



- h. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and section 63.9 and section 63.10 of 40 CFR Part 63, subpart A.

[ Authority for term: 40 CFR 63.346(b); OAC rule 3745-77-07(A)(3); PTI 13-04068 ]

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

[ Authority for term: 40 CFR 63.346(c); OAC rule 3745-77-07(A)(3); PTI 13-04068 ]

e) Reporting Requirements

- (1) The permittee shall submit to the Cleveland Division of Air Quality (Cleveland DAQ) an initial notification report that contains the following information:

- a. The name, title, and address of the owner or operator;
- b. The address (i.e., physical location) of the emissions unit;
- c. Identification of the applicable emission limitations and compliance date;
- d. A brief description, including the type of process operation performed;
- e. A statement that a trivalent chromium process that incorporates a wetting agent is being employed; and
- f. The list of bath components that comprise the trivalent chromium bath, with the wetting agent clearly identified.

[ Authority for term: 40 CFR 63.347(i)(1); OAC rule 3745-77-07(A)(3); PTI 13-04068 ]

- (2) The permittee shall submit a Notification of Compliance Status to the Cleveland DAQ signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance, and whether the information submitted in e)(1) is still accurate.

[ Authority for term: 40 CFR 63.347(i)(2); OAC rule 3745-77-07(A)(3); PTI 13-04068 ]

- (3) Within 30 days of a change to the trivalent chromium electroplating process, a report that includes:

- a. A description of the manner in which the process has been changed and the emission limitation, if any, now applicable to the affected emissions unit;
- b. If different emission limitation applies, then the application information required in the initial notification report; and



- c. The notification and reporting requirements of paragraphs (d), (e), (f), (g), and (h) of section 63.347 of 40 CFR Part 63, subpart N.

[ Authority for term: 40 CFR 63.347(i)(3); OAC rule 3745-77-07(A)(3); PTI 13-04068 ]

- (4) The permittee shall report to the Cleveland DAQ 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.

[ Authority for term: 40 CFR 63.347(d); 40 CFR 63.347(f); OAC rule 3745-77-07(A)(3); PTI 13-04068 ]

f) Testing Requirements

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

- a. Emission Limitation:

Chromium emissions shall not exceed 0.0083 ton per year.

Applicable Compliance Method:

The following equation (based on AP-42, "Compilation of Air Pollution Emission Factors" Section 12.20) shall be used:

$$E_a = E_c \times R_c \times 1/7000 \times H_r \times 1/2000$$

Where:

$E_a$  = actual annual chromium emissions in ton per year;

$E_c$  = 0.033 grains/amp-hr (emission factor for decorative chromium electroplating without fume suppressant from AP-42, Section 12.20, Table 12.20-1)(7/96);

$R_c$  = rectifier capacity in amps;

1/7000 = 1 pound per 7000 grains to convert from grains/hr to lbs/hr;

$H_r$  = hours per year of operation of chromium electroplating tank; and

1/2000 = 1 ton per 2000 pounds to convert from lbs/yr to ton/yr.

[ Authority for term: 40 CFR 63.344(c); OAC rule(s): 3745-31-05(A)(3), 3745-77-07(A)(3), and 3745-77-07(C); PTI 13-04068 ]



b. Emission Limitation:

Visible PE shall not exceed 20 percent opacity from any stack serving this emission unit, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

[ Authority for term: OAC rule(s): 3745-17-07(A), 3745-77-07(A)(3), 3745-77-07(C) ]

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

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

[ Authority for term: OAC rule(s): 3745-17-07(B), 3745-77-07(A)(3), and 3745-77-07(C); PTI 13-04068 ]

g) Miscellaneous Requirements

(1) None.



**5. P007, Exterior Chrome Line**

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

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

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) As effective 11/30/2001 PTI Modification P0110259 issued on 7/5/2012	Visible fugitive particulate emissions shall not exceed 5% opacity as a 3-minute average.  The requirements of this rule include compliance with the requirements of 40 CFR Part 63 Subpart N.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) As effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average. This limitation shall apply after USEPA approves the SIP per b)(2)a. below.
d.	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63 Subpart N.
e.	40 CFR Part 63 Subpart N	See b)(2)c. below.



(2) Additional Terms and Conditions

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

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

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

c) Operational Restrictions

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



- c. Determination of whether acceptable operation and maintenance procedures are being used shall be based on the facility records, which shall be made available to the regulating agency (Cleveland Division of Air Quality (Cleveland DAQ)) upon request, and which may include, but not be limited to: monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the regulating agency may require that the permittee make changes to the operation and maintenance plan if that plan:
    - i. does not address a malfunction that has occurred;
    - ii. fails to provide for the proper operation of the emissions unit, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
    - iii. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment, and/or monitoring equipment as quickly as practicable.
  - d. The standards and limitations that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.

[ Authority for term: 40 CFR 63.342(f)(3); OAC rule 3745-77-07(A)(3); PTI P0110259 ]
- (2) The permittee shall utilize an operation and maintenance plan for this emissions unit. The plan shall include the following elements:
- a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device, and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
  - b. The plan shall incorporate the work practice standards for the add-on air pollution control device and monitoring equipment required to demonstrate compliance with the standard.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control device(s), and process and control system monitoring equipment, and for implementing corrective actions to address any malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is



initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.

- f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions by phone to the regulating agency (Cleveland DAQ) within 2 working days following the actions performed inconsistent with the plan. This verbal report shall be followed by a letter within 7 working days following the event, unless the permittee makes alternative reporting arrangements, in advance, with the regulating agency.
- g. The permittee shall maintain the written operation and maintenance plan on record at the facility; and it shall be made readily available for inspection, at the request of the regulating agency and for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall maintain previous versions of the plan at the facility for a period of five years following each revision; the superseded version(s) of the plan shall also be made available for inspection, if so requested by the regulating agency.
- h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements of 40 CFR 63.342(f)(3).

[ Authority for term: 40 CFR 63.342(f)(3); OAC rule 3745-77-07(A)(3); PTI P0110259 ]

- (3) The operation and maintenance plan shall incorporate the following work practice standards for the packed-bed scrubber(s) control:
  - a. quarterly visual inspections of the packed-bed scrubber(s) to ensure there is proper drainage, no chromic acid buildup on the packed beds, and no evidence of chemical attack on the structural integrity of the device;
  - b. quarterly visual inspections of the back portion of the chevron blade mist eliminator(s) to ensure that it is dry and there is no breakthrough of chromic acid mist;
  - c. quarterly visual inspections of the ductwork from the tank to the packed-bed scrubber(s) to ensure there are no leaks; and



- d. adding fresh makeup water to the top of the packed bed(s). If greater than 50 percent of the scrubber water is drained (e.g., for maintenance purposes), makeup water may be added to the scrubber basin.

[ Authority for term: 40 CFR 63.342 Table 1; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

- (4) The operation and maintenance plan shall incorporate the maintenance and operational practices recommended by the manufacturer of the stalagmometer or tensiometer, which shall be used to measure surface tension of the electroplating or anodizing bath. Until performance testing is conducted and an alternative parameter limitation is established, the surface tension of the electroplating or anodizing bath shall not exceed 45 dynes per centimeter ( $3.1 \times 10^{-3}$  pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter ( $2.4 \times 10^{-3}$  pound-force/foot) as measured by a tensiometer at any time during tank operation.

[ Authority for term: 40 CFR 63.342(f)(3); OAC rule 3745-77-07(A)(3); PTI P0110259 ]

d) Monitoring and/or Recordkeeping Requirements

- (1) In addition to fulfilling all record keeping requirements contained in the General Provisions to 40 CFR Part 63, Subpart A, as they apply to the emissions unit, the permittee shall also maintain the following records:
  - a. inspection records for the add-on air pollution control device and monitoring equipment, to document that the inspection and maintenance required by the work practice standards contained in this permit have been performed. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
  - b. records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment;
  - c. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment;
  - d. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
  - e. other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan;
  - f. test reports documenting results of all performance tests;
  - g. all measurements as may be necessary to determine the conditions of performance tests;
  - h. records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected;



- i. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment;
- j. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment;
- k. the total process operating time of the emissions unit during the reporting period;
- l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements section of this permit and the general reporting requirements in 40 CFR 63.9 and 40 CFR 63.10, from subpart A; and
- m. records of the date and time that fume suppressants are added to the electroplating or anodizing bath.

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

[ Authority for term: 40 CFR 63.346; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

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



dynes per centimeter ( $2.4 \times 10^{-3}$  pound-force/foot) as measured by a tensiometer, if the permittee is using this value as the maximum surface tension value, shall constitute compliance with the standard.

- d. The surface tension shall be monitored using either a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Appendix A of Subpart N and according to the following schedule:
  - i. Following the compliance date, the surface tension shall be measured once every four hours during tank operation.
  - ii. The time between monitoring can be increased if there have been no exceedances. If there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Again if there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of surface tension measurements shall be once in every 40 hours of tank operation.
  - iii. Once an exceedance has occurred, as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed and a subsequent decrease in frequency shall follow the schedule in d)(2)d.ii. above.
  - iv. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in d)(2)d.ii. above.

[ Authority for term: 40 CFR 63.343; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

e) Reporting Requirements

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

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[ Authority for term: 40 CFR 63.347; OAC rule 3745-77-07(A)(3); PTI P0110259 ]



- (2) The permittee shall submit a Notification of Performance Test or Intent to Test to the Cleveland DAQ at least 60 calendar days before the performance test is scheduled. The permittee shall notify the Cleveland DAQ as soon as practicable if the performance test cannot be conducted as scheduled, and shall specify the date it will be rescheduled (provisions of 40 CFR 63.7(b)(2)).

[ Authority for term: 40 CFR 63.347; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

- (3) The permittee shall report, to the Cleveland DAQ, the results of any performance test conducted within 30 days of completion of such test. Reports of performance test results shall also be submitted in the Notification of Compliance Status Report, no later than 90 days following the completion of the performance test. Performance test results shall be documented in complete test reports that contain the following information:

- a. a brief description of the process;
- b. a description of the sampling location(s);
- c. a description of sampling and analytical procedures and any modifications to standard procedures;
- d. the test results;
- e. quality assurance procedures and results;
- f. records of operating conditions during testing, preparation of standards, and calibration procedures;
- g. raw data sheets for field sampling and field and laboratory analyses;
- h. documentation of calculations; and
- i. any other information required by the test method.

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

[ Authority for term: 40 CFR 63.347; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

- (4) The permittee shall submit a Notification of Compliance Status Report to the Cleveland DAQ, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit(s) is/are in compliance. The notification shall include the following information for each chromium electroplating tank subject to the NESHAP:

- a. the applicable emission limitation and the methods that were used to determine compliance with this limitation;
- b. the surface tension measurement and frequency of each measurement during the reporting period;



- c. for each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;
- d. the methods that shall be used to determine continuous compliance;
- e. a description of the air pollution control method(s) used for each emission point;
- f. a statement that the permittee has completed and maintains an operation and maintenance plan as required by the work practice standards; and
- g. a statement by the permittee as to whether the emissions unit is in compliance.

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

[ Authority for term: 40 CFR 63.347; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

- (5) Unless a more frequent reporting frequency has been determined, the permittee shall prepare and submit semiannual Ongoing Compliance Status Reports to the Cleveland DAQ in order to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. the company name and address of the emissions unit;
  - b. a description of the source, type of process performed, and the air pollution control method and monitoring device(s) that is/are/shall be used to demonstrate continuous compliance;
  - c. an identification of the operating parameter(s) that is/are/shall be monitored for compliance determination;
  - d. the relevant emission limitation for the emissions unit, and the operating parameter value(s), or range of values, established during compliance testing and reported in the notification of compliance status report(s);
  - e. the beginning and ending dates of the reporting period;
  - f. the total operating time of the emissions unit during the reporting period;



- g. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period; and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- h. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;
- i. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;
- j. a description of any changes in monitoring, processes, or controls since the last reporting period;
- k. the date of the report; and
- l. the name, title, and signature of the responsible official who is certifying the accuracy of the report.

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

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

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

[ Authority for term: 40 CFR 63.347; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

- (6) The permittee, if required to submit Ongoing Compliance Status Reports on a quarterly (or more frequent) basis, may request that the reporting frequency be reduced to semiannual if all of the following conditions are met:
  - a. for 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the Ongoing Compliance Status Reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit;
  - b. the permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR Part 63 subpart A and this permit; and



- c. the permittee submits a request (in writing) for approval from the Cleveland DAQ to reduce the frequency of reporting.

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

As soon as the monitoring data show that the facility is not in compliance with the relevant emission limit, the frequency of reporting shall revert to quarterly, and the permittee shall state this exceedance in the Ongoing Compliance Status Report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency to semiannual reports.

[ Authority for term: 40 CFR 63.347; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

f) Testing Requirements

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

[ Authority for term: 40 CFR 63.344; OAC rule 3745-77-07(A)(3); PTI P0110259 ]



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

[ Authority for term: 40 CFR 63.344; OAC rule 3745-77-07(A)(3); PTI P0110259 ]

(3) Emissions Limitation:

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

Applicable Compliance Method:

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

[ Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(A)(3), OAC rule 3745-77-07(C); PTI P0110259 ]

(4) Emission Limitation:

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

Applicable Compliance Method:

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

[ Authority for term: OAC rule 3745-17-07(B)(1), OAC rule 3745-77-07(A)(3), OAC rule 3745-77-07(C); PTI P0110259 ]

g) Miscellaneous Requirements

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



**6. P008, paint mask washing**

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

Paint mask washing, washing operations for paint masks, including 25-gallon solvent dip tank and two 5-gallon solvent recovery stills

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) PTI P0108877 issued on 1/4/2012	Organic compound (OC) emissions shall not exceed 10.0 tons per rolling 12-month period.  See c)(1) below.

(2) Additional Terms and Conditions

a. The requirements of OAC rules 3745-21-09(O) and 3745-21-23 do not apply because this emissions unit does not emit VOC emissions.

b. The requirements of OAC rule 3745-21-07(M) do not apply because there is no control device for this emissions unit and it does not emit VOC emissions.

c) Operational Restrictions

(1) The permittee shall use only non-VOC/non-HAP clean-up solvents in the mask wash.

[ Authority for term: PTI P0108877; OAC rule 3745-77-07(A)(3) ]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for this emissions unit:



- a. the company identification of each cleanup material employed;
- b. the amount, in pounds, of each cleanup material in stock on the first day of each month;
- c. the amount of each cleanup material purchased and received during the month, in pounds;
- d. sum the beginning inventory amount plus the amount purchased to determine total amount available for use during the month (sum of b + c), in pounds;
- e. the total OC emissions from all cleanup materials employed, in pounds (i.e. total amount available during the month minus the amount in stock on the first day of the following month).

[ Authority for term: PTI P0108877; OAC rule 3745-77-07(A)(3) ]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[ Authority for term: PTI P0108877; OAC rule 3745-77-07(A)(3) ]

- (2) The permittee shall submit deviation (excursion) reports that identify each time a solvent other than non-VOC was used in the mask wash and/or any exceedance of the organic compound emission limit. The deviation (excursion) reports shall be submitted to the Cleveland Division of Air Quality within thirty days after the deviation occurs.

[ Authority for term: PTI P0108877; OAC rule 3745-77-07(A)(3) ]

f) Testing Requirements

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

a. Emission Limitation:

OC emissions from this emissions unit shall not exceed 10.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1) by summing the monthly emissions in pounds for each rolling, 12-month period and divide by 2000 lbs/ton.

[ Authority for term: PTI P0108877; OAC rule 3745-77-07(A)(3) and OAC rule 3745-77-07(C) ]



**Proposed Title V Permit**  
Manufacturers Plating Company, Inc.

**Permit Number:** P0094298

**Facility ID:** 1318000838

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.