



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

1/22/2013

Mojtaba Mir-Salimi  
A-BRITE PLATING CO.  
3000 W 121ST ST  
CLEVELAND, OH 44111

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318000221  
Permit Number: P0112315  
Permit Type: Initial Installation  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

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

**How to appeal this permit**

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

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

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

## **How to get an electronic copy of your permit**

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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: CDAQ



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
A-BRITE PLATING CO.**

Facility ID:	1318000221
Permit Number:	P0112315
Permit Type:	Initial Installation
Issued:	1/22/2013
Effective:	1/22/2013
Expiration:	12/19/2022





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
A-BRITE PLATING CO.

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**Final Permit-to-Install and Operate**  
**A-BRITE PLATING CO.**  
**Permit Number: P0112315**  
**Facility ID: 1318000221**  
**Effective Date: 1/22/2013**

## Authorization

Facility ID: 1318000221  
 Application Number(s): A0046410  
 Permit Number: P0112315  
 Permit Description: Initial PTIO for emissions unit P011: trivalent decorative chrome plating line. Emissions unit began operating in October 2012. Rectifier capacity of tank is 6,000 amps. Emissions controlled by composite mesh-pad, packed-bed scrubber and mist eliminator. Chromium bath incorporates a wetting agent.  
 Permit Type: Initial Installation  
 Permit Fee: \$400.00  
 Issue Date: 1/22/2013  
 Effective Date: 1/22/2013  
 Expiration Date: 12/19/2022  
 Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

A-BRITE PLATING CO.  
 3000 W 121ST ST  
 Cleveland, OH 44111

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

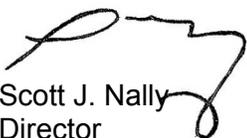
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
 Scott J. Nally  
 Director



**Final Permit-to-Install and Operate**  
A-BRITE PLATING CO.  
**Permit Number:** P0112315  
**Facility ID:** 1318000221  
**Effective Date:** 1/22/2013

## Authorization (continued)

**Permit Number:** P0112315  
**Permit Description:** Initial PTIO for emissions unit P011: trivalent decorative chrome plating line. Emissions unit began operating in October 2012. Rectifier capacity of tank is 6,000 amps. Emissions controlled by composite mesh-pad, packed-bed scrubber and mist eliminator. Chromium bath incorporates a wetting agent.

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

<b>Emissions Unit ID:</b>	<b>P011</b>
Company Equipment ID:	Pilot Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
A-BRITE PLATING CO.  
**Permit Number:** P0112315  
**Facility ID:** 1318000221  
**Effective Date:** 1/22/2013

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



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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



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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
A-BRITE PLATING CO.  
**Permit Number:** P0112315  
**Facility ID:** 1318000221  
**Effective Date:** 1/22/2013

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The following emissions units contained in this permit to 40 CFR Part 63, Subpart N, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks: P011. 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://www.ecfr.gov> or by contacting the Cleveland Division of Air Quality (CDAQ).

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



**Final Permit-to-Install and Operate**  
A-BRITE PLATING CO.  
**Permit Number:** P0112315  
**Facility ID:** 1318000221  
**Effective Date:** 1/22/2013

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



1. P011, Pilot Line

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

Trivalent decorative chrome plating controlled with wetting agent and by a composite mesh-pad system with packed-bed scrubber

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Chromium emissions shall not exceed 0.0005 ton/yr. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06.	See b)(2)b. below.
a.	OAC rule 3745-17-07(A)(1)	See b)(2)c. below.
c.	OAC rule 17-11-(B)	The particulate emission limit specified by this rule is less stringent than the emission limit established by 40 CFR Part 63, Subpart N.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart N [In accordance with 40 CFR 63.340 this emission unit is an existing decorative chrome electroplating tank subject to the emissions limitations/control measures specified in this section.]	Trivalent chromium bath components must contain a wetting agent as an ingredient.  See b)(2)b., c)(1), c)(2), d)(2), e)(6), and f)(3) below.
e.	40 CFR 63.1-16	Appendix B to Subpart N of 40 CFR Part 63 – Applicability of General Provisions to Subpart N shows which parts of the General Provisions in 40 CFR 63.1-16 apply.

(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) requirement under OAC rule 3745-31-03(A)(3) do not apply to the chromium from this air contaminant source since the uncontrolled potential to emit for chromium is less than 10 tons/yr.
- c. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
- d. The wetting agent used in the decorative chromium baths, P011, shall be documented to be an ingredient in the bath component(s) as purchased from the vendor(s), or it shall be clearly identified as a constituent in one of the components of the bath.



If the permittee ceases to use a bath component containing a wetting agent as purchased from the vendor in the trivalent chromium bath, the permittee shall comply with the applicable emission limitation of Subpart N within one year of switching bath components. Within 30 days of the change, the permittee shall submit a report to notify the Cleveland Division of Air Quality (Cleveland DAQ) of the process change and the applicable limitation required by the rule, from 40 CFR 63.342.

c) Operational Restrictions

- (1) After 9/21/2015 perfluorooctane sulfonic acid (PFOD)-based fume suppressants (containing 1% or greater PFOS by weight) shall not be used in any decorative chromium electroplating tanks using a trivalent chromium bath.
- (2) The permittee shall comply with the applicable operational restrictions and requirements under 40 CFR, Part 63 Subpart N, including the following sections:

63.342(e)	Standards for decorative chromium electroplating tanks using a trivalent chromium bath.
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d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63 as they apply to the emissions unit and shall also maintain records of the bath components purchased, with the wetting agent clearly identified as a bath constituent contained in one of the components. All records shall be maintained for a period of five years.
- (2) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63 Subpart N, including the following sections:

63.343(a)	Compliance dates.
63.346(b)(14)	Maintain records of bath components purchased.
63.346(c)	Maintain records for a period of 5 years in accordance with §63.10(b)(1).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-



Business Center: Air Services” although PERs can be submitted via U.S. postal service or can be hand delivered.

- (2) The permittee shall submit a notification of construction or reconstruction as soon as practicable before the constructions 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 locations) or proposed address of the affected source if different from the permittee’s;
  - c. a notification of intention to construct or make any physical or operational changes to an affected source 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 from the affected source, such as preliminary design drawings and design capacity if an add-on air pollution control device is used; and
  - i. an estimate of emission from the source based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emission 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.
  
- (3) 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 source and the components to be replaced;
  - b. a brief description of the present and proposed emission control technique, including the information required in e)(3) above;
  - c. an estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new source;
  - d. the estimated life of the affected source after the replacements; and
  - e. a discussion of any economic or technical limitations the source may have in complying with relevant standards or other requirements after the proposed



replacements. The discussion shall be sufficiently detailed to demonstrate to the Cleveland DAQ's satisfaction that the technical or economic limitations affect the source's ability to comply with the relevant standards and how they do so.

- (4) The permittee, using a trivalent chromium bath purchased with a wetting agent as a bath ingredient, 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 trivalent chromium electroplating tank subject to the NESHAP and demonstrating compliance through this method:
  - 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. an identification of 40 CFR Part 63, subpart N as the basis for the notification
  - d. identification of the applicable emission limitations and compliance date; a brief description of each affected source, including the type of process operation performed;
  - e. a statement that the decorative chromium electroplating process uses or will use a trivalent chromium bath that incorporates a wetting agent as a bath ingredient as purchased from the vendor; and
  - f. the list of components that comprise the trivalent chromium bath, with the wetting agent clearly defined.

The "Notification of Compliance Status Report" shall be submitted to the Cleveland DAQ, no later than 30 days after startup of the decorative chromium electroplating operations.

- (5) The permittee shall comply with the applicable reporting requirements under 40 CFR, Part 63 Subpart N, including the following sections:

63.345(b)	Notification of construction or reconstruction.
63.347(i)	Reports associated with trivalent chromium baths.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
Chromium emissions shall not exceed 0.0005 ton/yr



Applicable Compliance Method:

Compliance with the above emission limitation shall be determined through the record keeping requirements specified in d)(2) above and the following equation (based on AP-42, 5<sup>th</sup> Edition, Vol 1, Chapter 12.20, Electroplating):

$$E_a = (E_f) \times (R_c) \times (1 \text{ lb}/7000 \text{ grains}) \times (100 \text{ dscf}/A\text{-hr}) \times (H_r) \times (1 \text{ ton}/ 2000 \text{ lbs})$$

$$E_a = (1.2 \times 10^{-6} \text{ gr}/\text{dscf}) \times (6000 \text{ A}) \times (1 \text{ lb}/7000 \text{ grains}) \times (100 \text{ dscf}/A\text{-hr}) \times (\text{hrs}/\text{yr}) \times (1 \text{ ton}/ 2000 \text{ lbs})$$

Where:

$E_a$  = actual annual chromium emissions (ton per year)

$E_f$  = emission factor for decorative chromium electroplating line with fume suppressant ( $1.2 \times 10^{-6}$  gr/dscf)

$R_c$  = rectifier capacity in amps (6000 A)

$H_r$  = operating hours per year

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

- (2) The decorative trivalent chromium electroplating tank(s) is/are not subject to the work practice requirements of 40 CFR 63.342(f) or the continuous compliance monitoring requirements for the surface tension found in 40 CFR 63.343(c) if the following requirements are met:
- a. the trivalent chromium bath is purchased with a wetting agent incorporated as a component of the trivalent chromium bath ingredients;
  - b. the permittee maintains records of the bath components, with the wetting agent clearly identified as a bath constituent contained in one of the components; and
  - c. the permittee submits an initial notification documenting that the trivalent chromium process incorporates a wetting agent to comply with 40 CFR 63.432(e) and the list of bath components that comprise the trivalent chromium bath with the wetting agent clearly identified.
- (3) The permittee shall comply with the applicable testing methods under 40 CFR, Part 63 Subpart N, including the following sections:



**Final Permit-to-Install and Operate**  
A-BRITE PLATING CO.  
**Permit Number:** P0112315  
**Facility ID:** 1318000221  
**Effective Date:** 1/22/2013

63.343(b)(3)	Methods to demonstrate initial compliance for decorative chromium electroplating tank using a trivalent chromium bath.
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g) Miscellaneous Requirements

- (1) None.