



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
SHELBY COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 05-14388**

**Fac ID: 0575010106**

**DATE: 8/3/2006**

American Trim L.L.C.  
Rajesh Thotakura  
1501 W Michigan Ave  
Sidney, OH 45365

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

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

You are hereby notified that this action of the Director is final 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 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

SWDO



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 8/3/2006  
Effective Date: 8/3/2006**

---

**FINAL PERMIT TO INSTALL 05-14388**

Application Number: 05-14388  
Facility ID: 0575010106  
Permit Fee: **\$900**  
Name of Facility: American Trim L.L.C.  
Person to Contact: Rajesh Thotakura  
Address: 1501 W Michigan Ave  
Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1501 W Michigan Ave  
Sidney, Ohio**

Description of proposed emissions unit(s):  
**American Trim wishes to install 1. chrome plating line, 2. Dry filter spray booth with 2MMBtu/hr flash-off oven and 3. Bumper polishing and buffing, at Sidney Facility.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

American Trim L.L.C.  
PTI Application: 05-14388  
Issued: 8/3/2006

Facility ID: 0575010106

the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then 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 are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

American Trim L.L.C.  
PTI Application: 05-14388  
Issued: 8/3/2006

Facility ID: 0575010106

#### 4. 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.

#### 5. 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.

#### 6. 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 re-issuance, or modification
- 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, revoked, or revoked and reissued, for cause. 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 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.

**American Trim L.L.C.**  
**PTI Application: 05-14388**  
**Issued: 8/3/2006**

**Facility ID: 0575010106**

## **7. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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:
  - i. 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.
  - ii. 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 ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

American Trim L.L.C.  
PTI Application: 05-14388  
Issued: 8/3/2006

Facility ID: 0575010106

- iv. 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:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. 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.

#### 10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### 11. Best Available Technology

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

**American Trim L.L.C.**  
**PTI Application: 05-14388**  
**Issued: 8/3/2006**

**Facility ID: 0575010106**

**12. 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.

American Trim L.L.C.  
PTI Application: 05-14388  
Issued: 8/3/2006

Facility ID: 0575010106

### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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.)

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

**American Trim L.L.C.**  
**PTI Application: 05-14388**  
**Issued: 8/3/2006**

**Facility ID: 0575010106**

The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

American Trim L.L.C.  
PTI Application: 05-14388  
Issued: 8/3/2006

Facility ID: 0575010106

#### **4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **6. Public Disclosure**

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

#### **7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **8. Construction Compliance Certification**

**American Trim L.L.C.**  
**PTI Application: 05-14388**  
**Issued: 8/3/2006**

**Facility ID: 0575010106**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	12.13
PM10	11.91
SO2	0.0004
NOx	3.07
VOC	0.17
CO	2.53
Chrome	0.024

13

**American Trim L.L.C.**  
**PTI Application: 05-14388**  
**Issued: 8/3/2006**

**Facility ID: 0575010106**

Emissions Unit ID: **P141**

American Trim L.L.C.  
PTI Application: 05-14388  
Issued: 8/3/2006

Facility ID: **0575010106**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

Issued: 8/3/2006

**PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P141) - Chrome Plating Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	<p>Compliance with the requirements of 40 CFR Part 63 Subpart N</p> <p>Chromium emissions shall not exceed 0.008 lbs/hr nor 0.04 tons/yr</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11, and 40 CFR Part 63 Subpart N.</p> <p>The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:</p> <p>0.71 lbs/hr and 3.11 tons/yr NO<sub>x</sub>;  0.60 lb/hr and 2.61 tons/yr CO;  0.05 lb/hr and 0.24 ton/yr filterable PM;  0.6 lb/hr and 0.02 ton/yr SO<sub>2</sub>; and  0.04 lb/hr and 0.18 ton/yr VOC.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U) and 3745-17-07.</p>
OAC rule 3745-17-11	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Issued: 8/3/2006

40CFR Part 63 Subpart N	The permittee shall not allow the concentration of total chromium in the exhaust gas stream discharged from the decorative chromium electroplating tank or chromium anodizing tank to exceed 0.01 mg/dscm ( $4.4 \times 10^{-6}$ gr/dscf)
-------------------------	---

## 2. Additional Terms and Conditions

- 2.a** The hourly emission limitation for chromium of 0.008 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

## II. Operational Restrictions

1. The permittee shall implement the following work practices:
  - a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the chromium electroplating or anodizing tank, 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 (appropriate Ohio EPA District Office or local air agency) 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 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

Issued: 8/3/2006

- iii. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment, and/or monitoring equipment as quickly as practicable.
2. The operation and maintenance plan shall incorporate the following work practice standards for the composite mesh-pad control system; the plan shall provide procedures for:
  - a. quarterly visual inspections of the composite mesh-pad system, to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;
  - b. quarterly visual inspections of the back portion of the mesh pad closest to the fan, to ensure there is no breakthrough of chromic acid mist;
  - c. quarterly visual inspections of the ductwork from tank to the composite mesh-pad system, to ensure there are no leaks; and
  - d. washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.
3. The permittee shall burn only natural gas in this emissions unit.

### III. 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 of 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;

Emissions Unit ID: **P141**

- 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; and
  - l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and §63.9 and §63.10 of 40 CFR Part 63, subpart A.
2. The permittee shall perform the following monitoring and record keeping requirements in order to demonstrate compliance through the use of the composite mesh-pad system:
    - a. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods described in the "Testing Requirements" section of this permit. The pressure drop across the composite mesh-pad system shall be established as a site-specific operating parameter, setting the value that corresponds to compliance with the applicable emission

Issued: 8/3/2006

limitation, as established during performance testing.

- b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values; or may set, as the compliance value, the average pressure drop measured over the three test runs of one performance test and accept  $\pm 1$  inch of water column from this value as the compliant range.
  - c. On and after the date on which the initial performance test is required to be completed under §63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emissions unit is in operation. To be in compliance, the composite mesh-pad system shall be operated within  $\pm 1$  inch of water column of the pressure drop value established during compliance performance testing, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.
3. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **V. Testing Requirements**

1. Performance test results shall be documented in complete test reports that contain the following information:
  - a. a brief process description;
  - b. sampling location description(s);
  - c. a description of sampling and analytical procedures and any modifications to standard procedures;
  - d. test results;

Emissions Unit ID: P141

- 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 test plan shall be submitted to the regulating agency at least 60 days before the date the test is scheduled to begin.

2. Any performance test used to demonstrate compliance shall meet the following requirements:
  - a. the test methods and procedures identified in this permit shall be used during the performance test;
  - b. the performance test shall be conducted under representative operating *and/or worst-case* conditions;
  - c. the performance test report shall contain all the information required per 40 CFR 63.344(a); and
  - d. the permittee shall have sufficient data to establish the operating parameter value(s) that corresponds to compliance as required for continuous compliance monitoring.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements, in order to demonstrate compliance with the chromium emission limitation contained in this permit:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
  - b. One of the following test methods shall be employed to demonstrate compliance:
    - (1). Method 306 or Method 306A, "Determination of Chromium Emissions From Decorative and Hard Chromium Electroplating and Anodizing Operations" shall be used to determine the chromium concentration from the electroplating or anodizing tank.

Issued: 8/3/2006

- i. The sampling time and sample volume for each run of Methods 306 and 306A shall be at least 120 minutes and 1.7 dscm (60 dscf), respectively.
  - ii. Methods 306 and 306A allow the measurement of either total chromium or hexavalent chromium emissions. Emissions units using chromic acid baths can demonstrate compliance with the emission limits by measuring either the total chromium or hexavalent chromium concentration. Hence, the hexavalent chromium concentration measured by these methods is equal to the total chromium concentration for the affected operations.
- (2). The California Air Resources Board (CARB) Method 425 shall be used to determine the chromium concentration from the electroplating or anodizing tank if the following conditions are met:
  - i. If a colorimetric analysis method is used, the sampling time and volume shall be sufficient to result in 33-66 micrograms of catch in the sampling train.
  - ii. If an Atomic Absorption Graphite Furnace (AAGF) or Ion Chromatography (with a Post-column Reactor (ICPCR) analyses) is used, the sampling time and volume should be sufficient to result in a sample catch that is 5 to 10 times the minimum detection limit of the analytical method (i.e., 1.0 microgram per liter of sample for AAGF and 0.5 microgram per liter of sample for ICPCR).
- c. A minimum of three separate runs of the test method must be conducted in order to demonstrate compliance. All applicable requirements of §63.7 of 40 CFR Part 63, subpart A must also be met.
- d. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA regulating agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

Emissions Unit ID: P141

- e. Personnel from the regulating agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the regulating agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the regulating agency.
4. The permittee shall measure the pressure drop across the add-on air pollution control device in accordance with the following guidelines:
- a. Pressure taps shall be installed at any of the following locations:
    - i. at the inlet and outlet of the control system (the inlet tap should be installed in the ductwork just prior to the control device and the corresponding outlet pressure tap should be installed on the outlet side of the control device prior to the blower or on the downstream side of the blower);
    - ii. on each side of the packed bed within the control system or on each side of each mesh pad within the control system; and
    - iii. on the front side of the first mesh pad and back side of the last mesh pad within the control system.
  - b. Pressure taps shall be sited at locations that are:
    - i. as free from pluggage as possible and away from any flow disturbances such as cyclonic demisters; and
    - ii. situated such that no air infiltration at the measurement site will occur that could bias the measurement;
  - c. pressure taps shall be constructed of either polyethylene, polybutylene, or other non-reactive materials;
  - d. non-reactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop;
  - e. any of the following pressure gauges may be used to monitor pressure drop: a

**Issued: 8/3/2006**

magnehelic gauge, an included manometer, or a "U" tube manometer;

- f. prior to connecting any pressure lines to the pressure gauge(s), each gauge shall be zeroed (calibration of the pressure gauges is not required, with every required reading); and
- g. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected emissions unit are obtained. Verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written accuracy specifications or recommendations for installation, operation, and calibration of the system(s).

5. 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:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)

**VI. Miscellaneous Requirements**

None

Issued: 8/3/2006

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P141) - Chrome Plating Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: 8/3/2006

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P142) - Bumper Polishing**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate Emissions (PE) shall not exceed 2.68 lbs/hr nor 11.74 tons/yr  PM10 shall not exceed 0.93 lbs/hr nor 4.11 tons/yr  This emissions unit shall be equipment with a rotoclone system that will minimize or eliminate particulate emissions.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U), 3745-17-11 and 3745-17-07.
OAC rule 3745-17-11	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation for particulate (PE) of 2.68 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

**II. Operational Restrictions**

1. The permittee shall operate the rotoclones whenever this emissions unit is in operation.

**American Trim L.L.C.**  
**DTI Application: 05 11200**

**Facility ID: 0575010106**

**Emissions Unit ID: P142**

**Issued: 8/3/2006**

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that document any time periods when the rotoclone was not in service when the emissions unit was in operation.

**IV. Reporting Requirements**

1. The permittee shall notify the director (the appropriate District Office or local air agency) in writing of any daily record showing that the rotoclone was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. 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:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)

**VI. Miscellaneous Requirements**

None

Issued: 8/3/2006

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P142) - Bumper Polishing**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None