State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-08063

DATE: 2/16/00

CERTIFIED MAIL

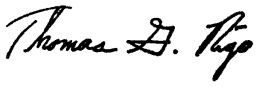
	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
Chrome Plating Subpart N	**MACT**
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Techneglas Inc
Larry Tock
727 E Jenkins Ave
Columbus, OH 43207

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$600** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.
Very truly yours,



Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CDO**
Mid-Ohio Reg Plan Com

DRAFT PERMIT TO INSTALL 01-08063

Application Number: 01-08063

APS Premise Number: 0125040296

Permit Fee: **To be entered upon final issuance**

Name of Facility: Techneglas Inc

Person to Contact: Larry Tock

Address: 727 E Jenkins Ave
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
727 East Jenkins Avenue
Columbus, Ohio

Description of proposed emissions unit(s):
Hard chrome plating tank number 2.

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 the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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.

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 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. 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.

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 this Permit To Install.

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 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.

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.

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 To Install 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install 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.

6. Construction of New Sources(s)

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

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

7. 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.

8. 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).

9. 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.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

11. 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., 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

Pollutant	Tons Per Year
Total Chrome	0.03

Part II -Facility Specific Terms and Conditions

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

A.I-V. Inclusive.

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

B.I-V. Inclusive

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Hard Chrome Electroplating Tank #2 w/Emission Elimination Device (EED) and Chrome Purification System w/Mist Eliminator	40 CFR Part 63 Subpart N	See A.2. a. below.

2. Additional Terms and Conditions

2.a. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere from the chrome electroplating tank to exceed 0.015 mg/dscm by conducting the qualitative test method approved in the USEPA letter of 12/2/99. Observed leaks in the EED shall be considered as indications of noncompliance with the Chrome Plating MACT.

II. 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 emission elimination devices (EEDs) and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

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

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the USEPA, 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 USEPA 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 emission units, 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.

4. The permittee shall implement the Operation and Maintenance Plan dated November 30, 1999 as approved by USEPA in a letter dated December 2, 1999 upon startup. 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 EED , 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 work practice standards for the EED as outlined in the Techneglas letter dated November 30, 1999, required under §63.342(f)(3)(C) and §63.343(d) of 40 CFR Part 63, Subpart N, for an air pollution control device not listed. These work practice standards shall include the following elements:

i. Prior to initiating the plating process, check plating bath for proper temperature range and note temperature on operations logsheet. Do not begin plating process in the tank until temperature is properly controlled.

ii. Lower the Emission Elimination Device (EED) onto the plating tank, making sure the clamps are seated properly against it. If clamps fail to operate properly, follow corrective action procedure in vii.4 below.

iii. Once per day for each tank in an electroplating process, conduct a positive pressure test by lightly tapping on one membrane on the EED while plating is occurring. The membrane should be taut and bowed slightly upward, and tapping on one of the membranes should result in movement of other parts of the same membrane or of the other membrane(s). Record test and results on the Mold Plating logsheet for each tank, as applicable. If positive pressure cannot be verified, follow corrective action procedure in step vii.2 below.

iv. Once per day for each tank in an electroplating process, observe seals and membranes for leaks and record observations on the Mold Plating logsheet. If leaks are observed at any time in the plating process, switch off the rectifier and follow corrective action procedure in step vii.1 below.

v. After the plating process is complete, the purge cycle will activate automatically. The EED may not be raised until timer completes the purge cycle. If purge cycle fails to activate, follow corrective action procedure in step vii.3 below.

vi. After ensuring that current from the rectifier has been switched off, open EED fully to access the plating tank. If appreciable mist is observed in the free board below the EED, do not recommence plating in the affected tank until the corrective action procedure in step vii.(c) below is followed.

vii. Corrective Action Procedures:

aa. Leaks of Mist/Smoke from Tank or Purge System -- If any leaks of mist or smoke are detected at any time from or around the plating tank(s) or purge cycle system, immediately switch off the current from the rectifier for the affected tank, and locate the source of the leak. Replace or repair item(s) causing leak. Note the nature of the corrective action taken and the date of those action on the maintenance logsheet. Do not recommence plating in the affected tank(s) until leaks have been repaired.

ab. No Positive Pressure -- If positive pressure on the EED membranes cannot be verified by tapping on one of the membranes, immediately turn off the rectifier for the affected tank, determine the cause of the loss of positive pressure, and repair or replace components as necessary. Note the nature of the corrective actions taken and the date of those actions on the maintenance logsheet. Do not recommence plating in the affected tank until causes have been identified and corrected.

ac. Failure of the Purge Cycle System -- If the purge cycle system fails to operate, or if appreciable mist is present above the bath after the EED is raised following completion of the purge cycle, check operation of purge system, including:

- Power supply (fuses, disconnects, etc.);
- Timers, relays, switches, etc. for proper operation or setpoint;
- Blower rotation, if motor is functioning;
- Disconnected piping or leaks (holes, cuts, etc.) In piping;
- Condition of purge system filter.

Replace, reset, or repair parts as necessary with appropriate materials, Note the nature of the corrective actions taken and the date of those actions on the maintenance logsheet. Do not use affected tanks until causes of problems have been identified and corrected.

ad. Failure of Lid Clamps to Operate Properly — If clamps fail to apply pressure at the start of the plating cycle, or fail to release following the end of the purge cycle, check the following:

- Hydraulic system controls and mechanical equipment;
- Power supply;
- Mechanical and electrical setpoints on clamps;

- Mechanical equipment for proper function.

Replace or repair components as necessary before starting or continuing plating in the affected tank. Note the nature of the corrective actions taken and the date of those action on the maintenance logsheet.

c. Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and

d. A systematic procedure for identifying malfunctions of process equipment, EEDs, 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 Ohio EPA Central District Office.

g. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA District Office 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 Ohio EPA District Office 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.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall follow the continuous compliance monitoring program as outlined in the Techneglas letter of November 30, 1999 and as approved in a USEPA letter of December 2, 1999 which includes the following:

   a. Beginning on the date of the initial performance test, Techneglas shall monitor and record the continued integrity of the EED seals and membranes. The two monitoring procedures listed below shall be conducted early in the plating cycle during each day in which electroplating occurs in each tank, in accordance with A.II.4.b.iii.

      i. Induce an external pressure to the membrane, which should be bulged slightly upward due to the positive pressure existing inside the EED. This can be done by manually tapping the bulged membrane downwards. By inducing external pressure on a segment of membrane, the balance of positive pressure is shifted to other part of the same membrane and/or to the other membranes. This should result in a movement at this and/or the other membrane when the system is adequately sealed and the membranes are intact. In the absence of such movement or rebound of the membrane indicating a lack of adequate seal or membrane integrity, corrective action procedure in A.II.4.b.vii.2. shall be followed.

      ii. Visually inspect lid seals and membranes, and the areas immediately above and around those seals and membranes to determine whether there are any leaks of chrome mist from the tank. If leaks are detected, corrective action procedure in A.II.4.b.vii.(a). above shall be followed

   b. The following inspection and maintenance activities shall be performed on the schedule indicated. Performance of these checks, the results, and any repairs or maintenance performed should be recorded on the maintenance checklist:

      i. Visually inspect lid seals and membranes for integrity once per week; repair or replace as needed.

      ii. Drain the purge cycle system once per week during each week in which a tank is operated.

      iii. Visually inspect membranes for perforations using a light source that adequately illuminates the membrane once per month; repair or replace as needed.

      iv. Visually inspect all clamps for proper operation once per month; repair or replace as needed.

      v. Clean or replace filters of the purge unit, once per month.

vi. Visually inspect piping to, piping from and body of purge unit to ensure there are no leaks and no evidence of chemical attack, once every three months; repair or replace components as needed.

vii. Perform smoke test and visually inspect the EED membrane, seals and conduit connections for leaks, once every six months; repair or replace any components as needed.

2. Operation of the affected source with the lack of adequate seals or membrane integrity shall constitute noncompliance with the standards.

3. The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.

4. The permittee also shall maintain the following records:

a. Inspection records for the EEDs 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, EEDs, and monitoring equipment.

c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, EEDs, and monitoring equipment. Records of all maintenance performed on the emissions unit, EEDs, 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 periods other than malfunction of the process, EEDs, or monitoring equipment.

j. The total process operating time of the emission unit during the reporting period.

k. 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.

5. All records 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 the permit. Such records may be maintained in computerized form.

IV. Reporting Requirements

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the Ohio EPA Central District Office 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 Ohio EPA Central District Office on or before the specified date.

2. The permittee shall submit to the Ohio EPA Central District Office an initial notification report that contains the following information:

   a. The date when construction or reconstruction was commenced, no later than 30 calendar days after such date; and

   b. The actual date of startup of the emissions unit within 30 calendar days after such date.

3. The permittee shall submit a Notification of Performance Test to the Ohio EPA Central District office at least 30 calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance as scheduled, the provisions of §63.7(b)(2) of 40 CFR Part 63, subpart A apply.

4. The permittee shall submit a Notification of Compliance Status to the Ohio EPA Central District Office thirty-days after the performance test is completed, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall list for each affected emissions unit:

   a. The applicable emission limitations and the methods that were used to determine compliance with this limitation.

   b. The test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit.

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 will be used to determine continuous compliance.

e. A description of the air pollution control technique used for each emission point.

f. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards.

g. A statement by the owner or operator as to whether the emissions unit is in compliance.

5. The permittee shall report to the Ohio EPA Central District Office 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.

6. The permittee shall prepare an ongoing compliance status report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Ohio EPA Central District Office 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. A description of the type of process performed in the emissions unit.

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 name, title, and signature of the responsible official who is certifying the accuracy of the report.

l. The date of the report.

7. 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 air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.

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

9. The Ohio EPA Central District Office 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.

10. 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 record keeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit.

c. The Ohio EPA Central District Office 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 Ohio EPA Central District Office in writing of its intentions to make such a change. The Ohio EPA Central District Office may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping 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 Ohio EPA Central District Office 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.

11. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the appropriate Ohio EPA District Office or local air agency 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

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.

V. Testing Requirements

1. Compliance with the emission limitation(s) shall be determined in accordance with the following method(s)

   a. Emission Limitation-

      0.015 mg/dscm

      Applicable Compliance Method-

      i. The permittee conducted an initial performance test on November 23, 1999 using the qualitative test method (smoke test) approved by USEPA in the letter of November 10, 1999. Thereafter, the emission testing shall be conducted at a six-month interval.

      ii. Not later than 30 days prior to the proposed initial test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. 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 Central District Office's or local air agency's refusal to accept the results of the emission test(s).

      iii. Performance test results of the initial test had been documented in a test report from Techneglas dated November 29, 1999 that contained the following information:

         aa. the operating temperature of the chrome plating solution (124 degrees Fahrenheit);

         ab. the time of the test(s) (9:50 am to 10:17 am);

         ac. a description of smoke generating device (Model 1A, Superior Brand) and any modifications to standard procedures;

         ad. test results (no leaks were observed from tank or purge system at any time during test);

         ae. quality assurance procedures and results (the EED was raised to verify that the smoke generating device had worked);

af. records of operating conditions during testing (the purge cycle experienced electrical difficulties with operating controls, but when activated, purged for three minutes and the lid was temporarily raised to verify the smoke was successfully purged);

ag. any other information required by the test method.

2. The results of the performance testing may be used to demonstrate compliance if:

a. The test methods and procedures identified in this permit were used during the performance test.

b. The performance test was conducted under representative conditions.

c. The performance test report contains elements of paragraph 3.a. through 3.g.

d. The permittee has sufficient data to establish the operating parameter value that corresponds to compliance as required for continuous compliance monitoring.

VI. Miscellaneous Requirements

None.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Hard Chrome Electroplating Tank #2 w/Emission Elimination Device (EED) and Chrome Purification System	OAC rule 3745-31-05	Total chromium emissions shall not exceed 0.007 lb/hr and 0.015 ton/yr. See B.2.a. below.
	OAC rule 3745-17-11(A)(2)	Less stringent than limit specified in B.2.a., below.

2. Additional Terms and Conditions

2.a. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 mg/dscm. BAT has been determined to be compliance with the applicable OAC rules by venting the chrome purification system to a mist eliminator.

II. Operational Restrictions

1. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the chromium purification 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.

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

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Ohio EPA Central District Office, 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 Ohio EPA Central District Office 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 emission units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or

c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall prepare an operation and maintenance plan to be implemented no later than six months following emission testing. 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. The O/M plan shall incorporate the following work practice standards:

      i. Visually inspect at least once per quarter the fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices.

      ii. Visually inspect at least once per quarter the duct work from the tank or tanks to the control device to ensure there are no leaks.

      iii. Perform washdown of the fiber elements in accordance with manufacturer's recommendations.

2. During the initial performance test, the permittee shall determine the outlet chromium concentration using the procedures in the "Testing Requirements" section of this permit to comply with the emission limitation through the use of a fiber-bed mist eliminator system. The permittee shall establish as a site-specific operating parameter, the pressure drop across the fiber-bed mist eliminator and the pressure drop across the control device installed upstream of the fiber bed to prevent plugging, setting the value that corresponds to compliance with the applicable limitation using the procedures in the "Testing Requirements" section of this permit.

3. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept ±1 inch of water column from this value as the compliant range.

4. On and after the date on which the initial performance test, the permittee shall monitor and record the pressure drop across the fiber-bed mist eliminator, and the control device installed upstream of the fiber bed to prevent plugging, once each day that the emission unit is

operating. To be in compliance, both the fiber-bed mist eliminator and the upstream control device shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

5. 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.

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

IV. Reporting Requirements

1. The permittee shall submit emissions testing report according to the Test Requirements of this section, unless the testing requirement is waived by the Ohio EPA Central District Office.

   a. 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.

   b. The methods that will be used to determine continuous compliance.

   c. A description of the air pollution control technique used for each emission point.

   d. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards.

   e. A statement by the owner or operator as to whether the emissions unit is in compliance. The permittee shall submit emissions testing report according to the Test Requirements of this section, unless the testing requirement is waived by the Ohio EPA Central District Office.

V. Testing Requirements

1. Compliance with the emission limitation(s) shall be determined in accordance with the following method(s)

   a. Emission Limitation-

      0.007 lb TCr/hr

      Applicable Compliance Method-

      Compliance with this mass emission limitation shall be based on emission testing per USEPA Method 306 or 306A

.

      0.015 mg/dscm * 283.2 E-6 gcf/mgcm * 1 lb/454 g * 11,800 acfm * 60 min/ 1 hr = 0.007 lb/hr

      b. Emission Limitation-

      0.015 ton TCr/yr

      Applicable Compliance Method-

The 0.015 ton TCr/yr limitation was developed by multiplying the 0.007 lb/hr limitation by the maximum operating schedule of 4380 hrs/yr and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

2. The permittee shall conduct emissions testing for this emissions unit in accordance with the following requirements:

   a. The emission testing shall be conducted within 6 months after permit issuance.

   b. Performance testing is a requirement for the chromium purification system associated with the chromium plating operations authorized by Ohio EPA PTI 01-8063.

   c. The emission testing shall be conducted in accordance with procedures approved by the Ohio EPA Central District Office.

3. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office .

4. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA Central District Office refusal to accept the results of the emission test(s).

5. Personnel from the Ohio EPA Central District Office 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.

6. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Central District Office 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 Ohio EPA Central District Office.

VI. Miscellaneous Requirements

1. Air Toxic Policy Clarifying Language

   Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or

use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Hard Chrome Electroplating Tank #1 w/Emission Elimination Device (EED) and Chrome Purification System w/Mist Eliminator	40 CFR Part 63 Subpart N	See A.2. a. below

2. Additional Terms and Conditions

2.a. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere from the chrome electroplating tank to exceed 0.015 mg/dscm by conducting the qualitative test method approved in the USEPA letter of 12/2/99. Observed leaks in the EED shall be considered as indications of noncompliance with the Chrome Plating MACT.

II. 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 emission elimination devices (EEDs) and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

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

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Ohio EPA Central District Office, 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 Ohio EPA Central District Office 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 emission units, 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.

4. The permittee shall implement the Operation and Maintenance Plan dated November 30, 1999 as approved by USEPA in a letter dated December 2, 1999 upon startup. 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 EED , 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 work practice standards for the EED as outlined in the Techneglas letter dated November 30, 1999, required under §63.342(f)(3)(C) and §63.343(d) of 40 CFR Part 63, Subpart N, for an air pollution control device not listed. These work practice standards shall include the following elements:

i. Prior to initiating the plating process, check plating bath for proper temperature range and note temperature on operations logsheet. Do not begin plating process in the tank until temperature is properly controlled.

ii. Lower the Emission Elimination Device (EED) onto the plating tank, making sure the clamps are seated properly against it. If clamps fail to operate properly, follow corrective action procedure in vii.4 below.

iii. Once per day for each tank in an electroplating process, conduct a positive pressure test by lightly tapping on one membrane on the EED while plating is occurring. The membrane should be taut and bowed slightly upward, and tapping on one of the membranes should result in movement of other parts of the same membrane or of the other membrane(s). Record test and results on the Mold Plating logsheet for each tank, as applicable. If positive pressure cannot be verified, follow corrective action procedure in step vii.2 below.

iv. Once per day for each tank in in an electrplating process, observe seals and membranes for leaks and record observations on the Mold Plating logsheet. If leaks are observed at any time in the plating process, switch off the rectifier and follow corrective action procedure in step vii.1 below.

v. After the plating process is complete, the purge cycle will activate automatically. The EED may not be raised until timer completes the purge cycle. If purge cycle fails to activate, follow corrective action procedure in step vii.3 below.

vi. After ensuring that current from the rectifier has been switched off, open EED fully to access the plating tank. If appreciable mist is observed in the free board below

the EED, do not recommence plating in the affected tank until the corrective action procedure in step vii.(c) below is followed.

vii. Corrective Action Procedures:

aa. Leaks of Mist/Smoke from Tank or Purge System -- If any leaks of mist or smoke are detected at any time from or around the plating tank(s) or purge cycle system, immediately switch off the current from the rectifier for the affected tank, and locate the source of the leak. Replace or repair item(s) causing leak. Note the nature of the corrective action taken and the date of those action on the maintenance logsheet. Do not recommence plating in the affected tank(s) until leaks have been repaired.

ab. No Positive Pressure -- If positive pressure on the EED membranes cannot be verified by tapping on one of the membranes, immediately turn off the rectifier for the affected tank, determine the cause of the loss of positive pressure, and repair or replace components as necessary. Note the nature of the corrective actions taken and the date of those actions on the maintenance logsheet. Do not recommence plating in the affected tank until causes have been identified and corrected.

ac. Failure of the Purge Cycle System -- If the purge cycle system fails to operate, or if appreciable mist is present above the bath after the EED is raised following completion of the purge cycle, check operation of purge system, including:

- Power supply (fuses, disconnects, etc.);
- Timers, relays, switches, etc. for proper operation or setpoint;
- Blower rotation, if motor is functioning;
- Disconnected piping or leaks (holes, cuts, etc.) In piping;
- Condition of purge system filter.

Replace, reset, or repair parts as necessary with appropriate materials, Note the nature of the corrective actions taken and the date of those actions on the maintenance logsheet. Do not use affected tanks until causes of problems have been identified and corrected.

ad. Failure of Lid Clamps to Operate Properly — If clamps fail to apply pressure at the start of the plating cycle, or fail to release following the end of the purge cycle, check the following:

- Hydraulic system controls and mechanical equipment;
- Power supply;

- Mechanical and electrical setpoints on clamps;
- Mechanical equipment for proper function.

Replace or repair components as necessary before starting or continuing plating in the affected tank. Note the nature of the corrective actions taken and the date of those action on the maintenance logsheet.

c. Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and

d. A systematic procedure for identifying malfunctions of process equipment, EEDs, 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 Ohio EPA Central District Office.

g. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA District Office 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 Ohio EPA District Office 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.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall follow the continuous compliance monitoring program as outlined in the Techneglas letter of November 30, 1999 and as approved in a USEPA letter of December 2, 1999 which includes the following:

a. Beginning on the date of the initial performance test, Techneglas shall monitor and record the continued integrity of the EED seals and membranes. The two monitoring procedures listed below shall be conducted early in the plating cycle during each day in which electroplating occurs in each tank, in accordance with A.II.4.b.iii.

i. Induce an external pressure to the membrane, which should be bulged slightly upward due to the positive pressure existing inside the EED. This can be done by manually tapping the bulged membrane downwards. By inducing external pressure on a segment of membrane, the balance of positive pressure is shifted to other part of the same membrane and/or to the other membranes. This should result in a movement at this and/or the other membrane when the system is adequately sealed and the membranes are intact. In the absence of such movement or rebound of the membrane indicating a lack of adequate seal or membrane integrity, corrective action procedure in A.II.4.b.vii.(b). shall be followed.

ii. Visually inspect lid seals and membranes, and the areas immediately above and around those seals and membranes to determine whether there are any leaks of chrome mist from the tank. If leaks are detected, corrective action procedure in A.II.4.b.vii.(a). above shall be followed

b. The following inspection and maintenance activities shall be performed on the schedule indicated. Performance of these checks, the results, and any repairs or maintenance performed should be recorded on the maintenance checklist:

i. Visually inspect lid seals and membranes for integrity once per week; repair or replace as needed.

ii. Drain the purge cycle system once per week during each week in which a tank is operated.

iii. Visually inspect membranes for perforations using a light source that adequately illuminates the membrane once per month; repair or replace as needed.

iv. Visually inspect all clamps for proper operation once per month; repair or replace as needed.

v. Clean or replace filters of the purge unit, once per month.

vi. Visually inspect piping to, piping from and body of purge unit to ensure there are no leaks and no evidence of chemical attack, once every three months; repair or replace components as needed.

vii. Perform smoke test and visually inspect the EED membrane, seals and conduit connections for leaks, once every six months; repair or replace any components as needed.

2. Operation of the affected source with the lack of adequate seals or membrane integrity shall constitute noncompliance with the standards.

3. The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A.

4. The permittee also shall maintain the following records:

   a. Inspection records for the EEDs 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, EEDs, and monitoring equipment.

   c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, EEDs, and monitoring equipment. Records of all maintenance performed on the emissions unit, EEDs, 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 periods other than malfunction of the process, EEDs, or monitoring equipment.

   j. The total process operating time of the emission unit during the reporting period.

   k. 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.

5. All records 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 the permit. Such records may be maintained in computerized form.

IV. Reporting Requirements

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the Ohio EPA Central District Office 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 Ohio EPA Central District Office on or before the specified date.

2. The permittee shall submit to the appropriate Ohio EPA Central District Office an initial notification report that contains the following information:

   a. The date when construction or reconstruction was commenced, no later than 30 calendar days after such date; and

   b. The actual date of startup of the emissions unit within 30 calendar days after such date.

3. The permittee shall submit a Notification of Performance Test to the Ohio EPA Central District office at least 60 calendar days before the performance test is scheduled. In the event that the permittee is unable to conduct the performance as scheduled, the provisions of §63.7(b)(2) of 40 CFR Part 63, subpart A apply.

4. The permittee shall submit a Notification of Compliance Status to the Ohio EPA Central District Office ninety days after the performance test is completed, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall list for each affected emissions unit:

   a. The applicable emission limitations and the methods that were used to determine compliance with this limitation.

   b. The test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit.

   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 will be used to determine continuous compliance.

   e. A description of the air pollution control technique used for each emission point.

   f. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards.

   g. A statement by the owner or operator as to whether the emissions unit is in compliance.

5. The permittee shall report to the Ohio EPA Central District Office 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.

6. The permittee shall prepare an ongoing compliance status report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Ohio EPA Central District Office 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. A description of the type of process performed in the emissions unit.

   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 name, title, and signature of the responsible official who is certifying the accuracy of the report.

   l. The date of the report.

7. 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 air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.

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

9. The Ohio EPA Central District Office 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.

10. 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 record keeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit.

    c. The Ohio EPA Central District Office 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 Ohio EPA Central District Office in writing of its intentions to make such a change. The Ohio EPA Central District Office may review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping 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 Ohio EPA Central District Office 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.

11. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the appropriate Ohio EPA District Office or local air agency 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.

    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

    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.

V. Testing Requirements

1. Compliance with the emission limitation(s) shall be determined in accordance with the following method(s)

    a. Emission Limitation-

    0.015 mg/dscm

    Applicable Compliance Method-

i. The permittee shall conduct an initial performance test using the qualitative test method (smoke test) approved by USEPA in the letter of December 2, 1999, prior to startup.

ii. Not later than 30 days prior to the proposed initial test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. 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 Central District Office's or local air agency's refusal to accept the results of the emission test(s).

iii. Performance test results of the initial test shall be documented in a test report containing the following information:

aa. the operating temperature of the chrome plating solution;

ab. the time of the test(s);

ac. a description of smoke generating device and any modifications to standard procedures;

ad. test results (leaks observed from tank or purge system at any time during test);

ae. quality assurance procedures and results;

af. records of operating conditions during testing; and

ag. any other information required by the test method.

2. The results of the performance testing may be used to demonstrate compliance if:

a. The test methods and procedures identified in this permit were used during the performance test.

b. The performance test was conducted under representative conditions.

c. The performance test report contains elements of paragraph 3.a. through 3.g.

d. The permittee has sufficient data to establish the operating parameter value that corresponds to compliance as required for continuous compliance monitoring.

VI. Miscellaneous Requirements

None.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Hard Chrome Electroplating Tank #1 w/Emission Elimination Device (EED) and Chrome Purification System w/Mist Eliminator	OAC rule 3745-31-05	Total chromium emissions shall not exceed 0.007 lb/hr and 0.015 ton/yr. See B.2.a. below.
	OAC rule 3745-17-11(A)(2)	Less stringent than limit specified in B.2.a., below.

2. Additional Terms and Conditions

2.a. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.015 mg/dscm. BAT has been determined to be compliance with the applicable OAC rules by venting the chrome purification system to a mist eliminator.

II. Operational Restrictions

1. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the chromium purification 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.

2. Malfunctions shall be corrected as soon as practicable after their occurance in accordance with the operation and maintenance plan.

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Ohio EPA Central District Office, 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 Ohio EPA Central District Office 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;

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b. fails to provide for the operation of the emission units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or

c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall prepare an operation and maintenance plan to be implemented no later than six months following emission testing. 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. The O/M plan shall incorporate the following work practice standards:

      i. Visually inspect at least once per quarter the fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices.

      ii. Visually inspect at least once per quarter the duct work from the tank or tanks to the control device to ensure there are no leaks.

      iii. Perform washdown of the fiber elements in accordance with manufacturer's recommendations.

2. During the initial performance test, the permittee shall determine the outlet chromium concentration using the procedures in the "Testing Requirements" section of this permit to comply with the emission limitation through the use of a fiber-bed mist eliminator system. The permittee shall establish as a site-specific operating parameter, the pressure drop across the fiber-bed mist eliminator and the pressure drop across the control device installed upstream of the fiber bed to prevent plugging, setting the value that corresponds to compliance with the applicable limitation using the procedures in the "Testing Requirements" section of this permit.

3. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept ±1 inch of water column from this value as the compliant range.

4. On and after the date on which the initial performance test, the permittee shall monitor and record the pressure drop across the fiber-bed mist eliminator, and the control device installed upstream of the fiber bed to prevent plugging, once each day that the emission unit is operating. To be in compliance, both the fiber-bed mist eliminator and the upstream control device shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance

test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

5. 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.

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

IV. Reporting Requirements

1. The permittee shall submit emissions testing report according to the Test Requirements of this section, unless the testing requirement is waived by theOhio EPA Central District Office.

   a. 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.

   b. The methods that will be used to determine continuous compliance.

   c. A description of the air pollution control technique used for each emission point.

   d. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards.

   e. A statement by the owner or operator as to whether the emissions unit is in compliance. The permittee shall submit emissions testing report according to the Test Requirements of this section, unless the testing requirement is waived by the Ohio EPA Central District Office.

V. Testing Requirements

1. Compliance with the emission limitation(s) shall be determined in accordance with the following method(s)

   a. Emission Limitation-

      0.007 lb TCr/hr

      Applicable Compliance Method-

      Compliance with this mass emission limitation shall be based on emission testing per USEPA Method 306 or 306A

      0.015 mg/dscm * 283.2 E-6 gcf/mgcm * 1 lb/454 g * 11,800 acfm * 60 min/ 1 hr = 0.007 lb/hr

   b. Emission Limitation-

      0.015 ton TCr/yr

      Applicable Compliance Method-

      The 0.015 ton TCR/yr limitation was developed by multiplying the 0.007 lb/hr limitation by the maximum operating schedule of 4380 hrs/yr and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

2. The permittee shall conduct emissions testing for this emissions unit in accordance with the following requirements:

   a. The emission testing shall be conducted within 6 months after initiation of plating operation

   b. Performance testing is a requirement for the chromium purification system associated with the chromium plating operations authorized by Ohio EPA PTI 01-8063.

   c. The emission testing shall be conducted in accordance with procedures approved by the Ohio EPA Central District Office.

3. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Central District Office.

4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. 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 Central District Office's refusal to accept the results of the emission test(s).

5. Personnel from the appropriate Ohio EPA Central District Office 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.

6. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Central District Office 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 Ohio EPA Central District Office.

VI. Miscellaneous Requirements

1. Air Toxic Policy Clarifying Language

   Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

NONE

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Total Chromium	0.03 ton/yr