



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

06/19/02

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

02-43-08-1158  
Component Repair Technologies Inc.  
John Brown  
8507 Tyler Boulevard  
Mentor, OH 44060

Dear John Brown:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

**If you have any questions or comments concerning this draft Title V permit, please contact Northeast District Office.**

Very truly yours,

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

cc: USEPA (electronically submitted)  
File, DAPC PMU  
Northeast District Office  
Pennsylvania



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/19/02

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 02-43-08-1158 to:

Component Repair Technologies Inc.

8507 Tyler Boulevard

Mentor, OH 44060

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Paint Spray Booth) Paint spray booth (Coating/Printing Operations EAC).	P001 (Plasma Spray Booths 1-3) Three (3) plasma metalizer booths (Process EAC).	P006 (Hard Chromium Plating Tank) Hard chromium electroplating line (T10) (Process EAC).
L003 (Detrex Vapor Degreaser) Open-top batch vapor degreaser (Solvent Metal Cleaning EAC).	P005 (Hard Chromium Plating Tank) Hard chromium electroplating line (T8) (Process EAC).	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

\_\_\_\_\_  
Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
  
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
  
- c. 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 record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  - 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 record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. 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. (These quarterly

reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.

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

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.

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

- 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.

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

## **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 condition, of any emissions unit(s) 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

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

## **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.

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

## **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.

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

## 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.

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

## 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, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

## 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.

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

## 8. Marketable Permit Programs

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

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

**9. Reasonably Anticipated Operating Scenarios**

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

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

**10. Reopening for Cause**

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

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

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

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All

other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

## 12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - 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 paragraph (E) of OAC rule 3745-77-03.
  - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:

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

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

### **13. Permit Shield**

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

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

### **14. Operational Flexibility**

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

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

### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This

emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

## **16. Off-Permit Changes**

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

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

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

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

## **17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited

to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

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

**18. Insignificant Activities**

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

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

**19. Permit to Install Requirement**

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

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

**20. Air Pollution Nuisance**

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

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

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (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.)

**2. Records Retention Requirements**

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.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. Scheduled Maintenance/Malfunction Reporting**

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

**5. 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.

**6. 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.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
2. This facility is not subject to the Aerospace MACT (40 CFR, Part 63, Subpart GG) because the potentials to emit, taking into account control measures required by the degreaser MACT, are less than the major source thresholds.

**B. State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility:

K002 - Hot Melt Tanks  
P002 - Johnston Heat Treat Furnace  
P007 - Ace Burnout Oven  
R001 - FPI Booths  
Z001 - Landa Pressure Washer  
Z002 - Alkaline Clean Tanks  
Z003 - Nickel Solution Tanks  
Z004 - Acid Rinse Tank T6  
Z005 - Hydrochloric Acid Spare Tank T5  
Z006 - Sulfuric Acid Tank T3  
Z007 - Sulfuric-Hydrofluoric Acid Tank T4  
Z008 - Laboratory Fumehood  
Z009 - Welding Stations 1-7  
Z010 - Argon AST  
Z011 - Vertical Grinders w/ Oil Mist Collector (2)  
Z012 - Delvieg Horizontal Jig Mills 1-4  
Z013 - Grinders 1-9  
Z014 - Lathes 1-3  
Z015 - Vertical Turret Lathes 1-9  
Z016 - Blast Booth 1 with Baghouse (Zero #60 Grit Aluminum Oxide)  
Z017 - Blast Booth 2 with Baghouse (Zero #180 Grit Aluminum Oxide)  
Z018 - Blast Booth 3 with Baghouse (Empire 500 Grit Alumina)  
Z019 - Blast Booth 4 with Baghouse (Empire Aluminum Oxide 180 Grit)  
Z020 - Blast Booth 5 with Baghouse (Zero Portable Blast Aluminum Oxide)  
Z021 - Blast Booth 6 with Baghouse (Zero #30 Grit Aluminum Oxide)  
Z022 - Blast Booth 7 with Baghouse (0.007 - 0.011 Diameter Glass Beads)  
Z023 - Blast Booth 8 with Baghouse (Maxi-Blast Dry Plastic Media)  
Z024 - Portable Dust Collectors 1-7  
Z025 - Shot Peening  
Z026 - Stationary Dust Collectors 1-4  
Z027 - Grieve Oven  
Z028 - Lindberg Electric Oven  
Z029 - Precision Quincy Oven 7001-00  
Z030 - Precision Quincy Oven 7006-01  
Z031 - Precision Quincy Oven 7007-00  
Z032 - Precision Quincy Oven 7008-01  
Z033 - Precision Quincy Oven (FPI)  
Z034 - Aqueous Clean Line  
Z035 - Paint Strip Tank  
Z036 - Rust Inhibitor Dip Tanks (2)  
Z037 - Steel Clean Line  
Z038 - Titanium Clean Line  
Z039 - Leeson Aluminum Oxide Booth  
Z040 - Zero Blast Booth with baghouse

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Paint Spray Booth (K001)

**Activity Description:** Paint spray booth (Coating/Printing Operations EAC).

#### A. State and Federally Enforceable Section

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
miscellaneous metal parts coating line, including oven, for the coating of metal aircraft parts	OAC rule 3745-31-05(A)(3) (PTI 02-4336 - modified on May 26, 1993)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-09(U), 3745-17-11(B)(1), and 3745-17-07(A)(1).
	OAC rule 3745-21-09(U)(1)(i)	Pursuant to OAC rule 3745-21-09(U)(2)(e), this coating line is exempt from the VOC content limitations specified in OAC rule 3745-21-09(U)(1) as long as the permittee never employs more than three gallons of coating per day in this line. (See section A.I.2.b.)
	OAC rule 3745-17-11(B)(1)	0.551 lb of particulate emissions per hour
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from either stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall not employ more than 3 gallons of coating per day in this emissions unit.
- 2.b The 3 gpd exemption level is not yet part of the federally-approved SIP for ozone; however, the revised rule that contains the 3 gpd exemption level has been submitted to the USEPA for approval as part of the Ohio SIP for ozone. The 3 gpd exemption level will be the applicable, federally-enforceable exemption level while the SIP approval is being promulgated by the USEPA.

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all of the coatings employed.

### IV. Reporting Requirements

1. The permittee shall notify the Northeast District Office of Ohio EPA (NEDO) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to NEDO within 45 days after the exceedance occurs.

### V. Testing Requirements

1. Compliance with the emission limitations and usage restriction in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

**1.a** Usage Restriction:

The permittee shall not employ more than 3 gallons of coating per day in this emissions unit.

Applicable Compliance Method:

Compliance with the above usage restriction shall be determined by the record keeping specified in section A.III.1. of these terms and conditions.

**1.b** Emission Limitation:

0.551 lb of particulate emissions per hour

Applicable Compliance Method:

To determine the worst case particulate emissions rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

where E = particulate emissions rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

**1.c** Emission Limitation:

Visible particulate emissions from either stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Detrex Vapor Degreaser (L003)

**Activity Description:** Open-top batch vapor degreaser (Solvent Metal Cleaning EAC).

#### A. State and Federally Enforceable Section

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Detrex trichloroethylene open-top batch vapor degreaser	OAC rule 3745-31-05(A)(3) (PTI 02-13738)	9.9 tons per year of volatile organic compounds (VOC)
	40 CFR, Part 63, Subpart T	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O) and 40 CFR, Part 63, Subpart T.
	OAC rule 3745-21-09(O)	See sections A.I.2.a and A.II.1 through A.II.4 of these terms and conditions.
		In accordance with OAC rule 3745-21-09(O)(6)(b), the requirements of OAC rule 3745-21-09(O)(4) shall not apply to this emissions unit. (See section A.I.2.d.)

## 2. Additional Terms and Conditions

- 2.a** The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
- i. The solvent cleaning machine shall be designed or operated to meet the following control equipment or technique requirements:
    - (a) Use of reduced room draft that ensures that the flow of movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in section A.III.5. of these terms and conditions.
  - ii. The solvent cleaning machine shall have a freeboard ratio of 0.75 or greater.
  - iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - iv. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
  - v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
  - vi. The solvent cleaning machine shall have a primary condenser.
- 2.b** The permittee shall ensure that the chilled air blanket temperature (in degrees F or C), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- 2.c** The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less during the initial monitoring test.
- 2.d** This rule citation reflects the new exemption added to OAC rule 3745-21-09(O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. USEPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for ozone.

## II. Operational Restrictions

- 1.** The permittee shall meet all of the following required work and operational practices:
- 1.a** Control air disturbances across the solvent cleaning machine opening(s) by incorporating the following control equipment or techniques:
- i. The permittee shall employ a reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in section A.III.5. of these terms and conditions. The permittee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Record Keeping Requirements" section of this permit.
- 1.b** The parts baskets or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.

## II. Operational Restrictions (continued)

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

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall monitor the hoist speed as described below:
  - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
  - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
  - d. If the permittee can demonstrate to the satisfaction of the Director in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
  - a. Owner's manuals, or, if manuals are not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
  - b. The date of installation for the solvent cleaning machine and all of its control devices.
  - c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
  - a. The results of control device monitoring required in this section of the permit.
  - b. Information on actions taken to comply with 40 CFR 63.463(e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
  - c. Estimates of annual trichloroethylene consumption for the solvent cleaning machine.
4. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or a thermocouple to measure the temperature at the center of the air blanket during the idling mode.
5. The permittee shall monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
6. The permittee shall maintain the following information for this emissions unit every year:
  - a. The name and company identification of each solvent employed in this emissions unit.
  - b. The amount of each cleaning solvent employed, to be defined as "L<sub>i</sub>," in gallons per year.
  - c. The density of each solvent, to be defined as "D<sub>i</sub>," in pounds per gallon.
  - d. The amount of each cleaning solvent sent off-site as waste, defined as "L<sub>wi</sub>," in gallons per year.
  - e. The amount of VOC emitted, to be defined as "MOC," in tons per year. MOC shall be calculated as follows:

MOC = the sum,  $i = 1$  to  $i = n$ , of  $[(L_s - L_w) \times D]_i$ , divided by 2,000 pounds per ton

### IV. Reporting Requirements

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

#### IV. Reporting Requirements (continued)

2. The permittee shall submit an exceedance report on a semiannual basis. If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or greater and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters per minute and no correction was made within 15 days of detection, and if the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30 % of the solvent's boiling point and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval for a less frequent reporting frequency from the Director. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director does not object to a reduced frequency of reporting for the affected emissions unit as provided in 40 CFR 63.1(e)(3)(iii) General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

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

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

Written reports shall be submitted to the Northeast District Office of Ohio EPA (NEDO) 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.

#### V. Testing Requirements

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

a. Determine the PTE for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAL_i$$

where:

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

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year).

$H_i$  = 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour).

$W_i$  = 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

$SAL_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). 40 CFR 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/area interface shall calculate a solvent/air interface area using the procedure below.

**V. Testing Requirements (continued)**

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

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

where:

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

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

c. Sum the PTEi for all solvent cleaning operations to obtain the total PTE for solvent cleaning operations at the facility.

2. Compliance with the emission limitation in section A.I.1. of terms and conditions shall be determined in accordance with the following method:

Emission Limitation:  
9.9 tons per year of VOC

Applicable Compliance Method:  
Compliance with the above annual VOC limitation shall be based upon the record keeping requirements specified in section A.III.6 of these terms and conditions.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Plasma Spray Booths 1-3 (P001)  
**Activity Description:** Three (3) plasma metalizer booths (Process EAC).

#### A. State and Federally Enforceable Section

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

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three (3) plasma metalizer booths controlled by two baghouses		
plasma booth #1 (robotic), controlled by baghouse #1	OAC rule 3745-31-05(A)(3) (PTI 02-16337)	0.50 TPY of PE  There shall be no visible emissions from the baghouse stack serving this emissions unit.
	OAC rule 3745-17-11(B)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)(1)	0.551 lb of particulate emissions (PE)/hr The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
plasma booth #2 (robotic), controlled by baghouse #2	OAC rule 3745-31-05(A)(3) (PTI 02-16337)	0.50 TPY of PE  There shall be no visible emissions from the baghouse stack serving this emissions unit.
	OAC rule 3745-17-11(B)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)(1)	0.551 lb of PE/hr The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plasma booth #3 (manual), controlled by baghouse #2	OAC rule 3745-31-05(A)(3) (PTI 02-4336)	less than 0.25 TPY of PE  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A)(1).
	OAC rule 3745-17-11(B)(1)	0.551 lb of PE/hr
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the baghouse stack shall not exceed 20 % opacity, as a six-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- 2.a All PE generated by each booth shall be captured and vented to the respective baghouse, and each baghouse shall be in operation at all times while the associated booth is in operation.

**II. Operational Restrictions**

1. To ensure compliance with the annual PE limits specified above, booths #1 and #2 shall each not operate more than 1,814 hours per year and booth #3 shall not operate more than 907 hours per year.
2. The pressure drop across each baghouse shall be maintained within a range of 2 to 7 inches of water column at all times while a booth vented to it is in operation.

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the total number of operating hours for each of booths #1, #2, and #3.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse when the emissions units vented to them are in operation. The pressure drop monitors shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across each baghouse on a daily basis. The units for pressure drop shall be inches of water column.
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from any stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports summarizing the total annual operating hours for each of booths #1, #2, and #3. These reports shall be submitted by January 31 of each year and shall include the annual operating hours for the previous calendar year.
2. The permittee shall submit written deviation (excursion) reports that identify all periods of time during which the pressure drop across either baghouse did not comply with the required range specified in section A.II. of these terms and condition, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit quarterly written reports that (a) identify all days during which any visible PE from any stack serving this emission unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Northeast District Office of Ohio EPA by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter.

#### V. Testing Requirements

1. Compliance with the emission limitations specified in section A.I. and the operational restrictions specified in section A.II. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:  
0.551 lb of PE/hr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following equation:

$$PE = U \times (1 - TE) \times (1 - CE)$$

where:

PE = maximum hourly PE rate;

U = maximum hourly usage rate (8 lbs/hr);

TE = fractional transfer efficiency (0.65, assumed); and

CE = fractional control efficiency (0.99).

If required, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B)(10).

- 1.b Emission Limitation:  
0.50 TPY (booths #1 and #2), 0.25 TPY (booth #3)

Applicable Compliance Method:

Compliance with the annual PE limit shall be determined by multiplying the actual annual operating hours (as determined by the record keeping specified in section A.III.) by the hourly PE limit (0.551 lb/hr) and dividing by 2,000.

- 1.c Emission Limitation:  
There shall be no visible emissions from the baghouse stacks.

Applicable Compliance Method:

Compliance with the above visible emission limitation shall be determined using Method 22 of 40 CFR, Part 60, Appendix A.

**V. Testing Requirements (continued)**

- 1.d** Operational Restriction:  
To ensure compliance with the annual PE limits specified above, booths #1 and #2 shall each not operate more than 1,814 hours per year and booth #3 shall not operate more than 907 hours per year.

Applicable Compliance Method:

Compliance with the above operational restriction shall be determined by the monthly record keeping in section A.III. and shall be the sum of the monthly operating hours for the calendar year.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
three (3) plasma metalizer booths controlled by two baghouses	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary for nickel because the maximum annual emissions from booths #1 and #2 for this toxic compound will be no more 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 cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Hard Chromium Plating Tank (P005)  
**Activity Description:** Hard chromium electroplating line (T8) (Process EAC).

#### A. State and Federally Enforceable Section

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

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T-8 hard chromium electroplating line, with mist eliminator/composite mesh-pad control system	OAC rule 3745-31-05(A)(3) (PTI 02-1055)	There shall be no visible emissions from any stack serving this emissions unit.
	40 CFR, Part 63, Subpart N	The requirements of this rule also include the requirements of 40 CFR, Part 63, Subpart N. 0.0002949 lb of chromium per hour or 0.015 milligrams of chromium per dry standard cubic meter (mg/dscm)
	OAC rule 3745-17-11(B)(1)	See section A.I.2.a. The emission limitation established in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified in this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall utilize a composite mesh-pad mist eliminator to effectively reduce and control emissions of chromium to within the allowable mass emission limitation.

##### II. Operational Restrictions

- At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

## II. Operational Restrictions (continued)

2. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.
3. The permittee shall implement an operation and maintenance plan that includes the following elements regarding the composite mesh-pad system:
  - a. The plan shall specify the operation and maintenance (O&M) criteria for the affected source, the composite mesh-pad control system, 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 the device at least once per quarter to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
    - ii. Visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
    - iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.
    - iv. Perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.
4. The permittee shall implement an operation and maintenance plan that includes the following elements regarding the mist eliminator:
  - a. Visually inspect at least once per quarter the fiber-bed unit and prefiltering device to ensure that there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices.
  - b. Visually inspect at least once per quarter the ductwork from the tank or tanks to the control device to ensure that there are no leaks.
  - c. Perform washdown of the fiber elements in accordance with the manufacturer's recommendations.
5. The plan shall specify the operation and maintenance criteria for this emissions unit, the composite mesh-pad system and the process and control monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
6. The permittee shall at all times, including periods of startup, shutdown, and malfunction, operate and maintain this emissions unit, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan.
7. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

## II. Operational Restrictions (continued)

8. Determination of whether acceptable operation and maintenance procedures are being used will be based upon information available to NEDO which may include, but is not limited to the following: monitoring results; review of the operation and maintenance plan, procedures and records; and inspection of the emissions unit. Based upon this information, NEDO may require that the permittee make changes to the operation and maintenance plan if that plan:
- does not address a malfunction that has occurred;
  - fails to provide for the operation of the emissions 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
  - does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

The permittee shall revise the operation and maintenance plan if required by NEDO.

Within 45 days of an occurrence of a malfunction, the permittee shall revise the operation and maintenance plan if it fails to adequately address that malfunction. If the actions taken during the malfunction are not specified in the operation and maintenance plan, the permittee shall record the alternate actions and within 2 working days of these actions report them to the NEDO, unless the permittee makes alternate reporting arrangements in advance. The report shall be followed by a letter to NEDO within 7 working days after the end of the event.

The permittee shall maintain the operation and maintenance plan and make it available for inspection for as long as the sources operate or until they are no longer subject to this rule. If the operation and maintenance plan is revised, the superseded versions shall be maintained for inspection for 5 years after each revision to the plan.

The permittee shall not use a reducing agent to change the form of the chromium from hexavalent to trivalent in order to meet standards that apply to chromic acid baths.

The permittee shall comply with the record keeping and reporting requirements associated with the operation and maintenance plan as identified in 40 CFR 63.346(b) and 63.347(g), respectively.

9. The composite mesh-pad system shall be operated within +/- 1 inch of water column of the pressure drop value of 9.2 inches of water column established during the initial performance test.

## III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the composite mesh-pad control system when the emissions unit is in operation. The pressure drop monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall monitor and record the pressure drop across the composite mesh-pad control system once each day that the emission unit is operating. The units for pressure drop shall be inches of water column.
- The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR, Part 63, Subpart A and maintain all of the applicable records/documents listed in 40 CFR 63.346(b) of Subpart N.

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee also shall maintain the following records:
  - a. Inspection records for the composite mesh-pad control system 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, the composite mesh-pad control system, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of the process, the composite mesh-pad control system, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, the composite mesh-pad control system, 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, the composite mesh-pad control system, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements section of this permit and 40 CFR 63.9 and 63.10.
  - m. Records of the actual cumulative rectifier capacity of the hard chromium electroplating tanks expended during each month of the reporting period, and the total capacity expended to date for a reporting period.
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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

1. The permittee shall report to NEDO the results of any performance test conducted. The report shall be submitted no later than 90 days following the completion of the performance test.
2. The permittee shall prepare an ongoing compliance status report semiannually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to NEDO 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.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.
  - i. A description of any changes in monitoring, processes, or controls since the last reporting period.
  - j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
  - k. The date of the report.
  - l. The actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis.

The report shall be completed annually and retained on site and made available to NEDO upon request.
3. The permittee shall submit semiannual reports if the following conditions are met:
  - a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
  - b. the total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.
4. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce the reporting frequency is approved.
5. NEDO 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.

#### **IV. Reporting Requirements (continued)**

6. 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., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR, Part 63, Subpart A and others listed in this permit.
  - c. NEDO does not object to reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies NEDO in writing of its intention to make such a change, and NEDO does not object to the intended change. In deciding whether to approve a reduced reporting frequency, NEDO may review information concerning the facility's entire previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is disapproved, the permittee will be notified in writing within 45 days after NEDO receives notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.
    - ii. As soon as the monitoring data show that the facility is not in compliance with the relevant emission limit, the frequency of reporting shall revert to quarterly, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.
7. The permittee shall submit quarterly written reports that (a) identify all days during which any visible particulate emissions from any stack serving this emission unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to NEDO by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter.

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

1. Emissions Limitation:  
The maximum concentration of total chromium in the exhaust gas stream from this emissions unit shall not exceed 0.0002949 lb of chromium per hour or 0.015 mg of chromium per dscm.

Applicable Compliance Method:

Performance tests were conducted on October 15, 1997, and the results showed an average chromium emission rate of 0.0066 mg/dscm for this emissions unit. If required, additional performance testing shall be conducted in accordance with the test methods and procedures specified in 40 CFR, Part 63, Subpart N. Ongoing compliance shall be based upon the established operating parameters for the pressure drop across the composite mesh-pad emission control system.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Hard Chromium Plating Tank (P006)  
**Activity Description:** Hard chromium electroplating line (T10) (Process EAC).

#### A. State and Federally Enforceable Section

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T-10 hard chromium electroplating line, with mist eliminator/composite mesh-pad control system	OAC rule 3745-31-05(A)(3) (PTI 02-1055)	There shall be no visible emissions from any stack serving this emissions unit.
	40 CFR, Part 63, Subpart N	The requirements of this rule also include the requirements of 40 CFR, Part 63, Subpart N.  0.0002949 lb of chromium per hour or 0.015 milligrams of chromium per dry standard cubic meter (mg/dscm)
	OAC rule 3745-17-11(B)(1)	See section A.I.2.a.  The emission limitation established in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified in this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall utilize a composite mesh-pad mist eliminator to effectively reduce and control emissions of chromium to within the allowable mass emission limitation.

##### 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 air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

## II. Operational Restrictions (continued)

2. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.
3. The permittee shall implement an operation and maintenance plan that includes the following elements regarding the composite mesh-pad system:
  - a. The plan shall specify the operation and maintenance (O&M) criteria for the affected source, the composite mesh-pad control system, 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 the device at least once per quarter to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
    - ii. Visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
    - iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.
    - iv. Perform washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.
4. The permittee shall implement an operation and maintenance plan that includes the following elements regarding the mist eliminator:
  - a. Visually inspect at least once per quarter the fiber-bed unit and prefiltering device to ensure that there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices.
  - b. Visually inspect at least once per quarter the ductwork from the tank or tanks to the control device to ensure that there are no leaks.
  - c. Perform washdown of the fiber elements in accordance with the manufacturer's recommendations.
5. The plan shall specify the operation and maintenance criteria for this emissions unit, the composite mesh-pad system and the process and control monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
6. The permittee shall at all times, including periods of startup, shutdown, and malfunction, operate and maintain this emissions unit, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan.
7. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

## II. Operational Restrictions (continued)

8. Determination of whether acceptable operation and maintenance procedures are being used will be based upon information available to NEDO which may include, but is not limited to the following: monitoring results; review of the operation and maintenance plan, procedures and records; and inspection of the emissions unit. Based upon this information, NEDO may require that the permittee make changes to the operation and maintenance plan if that plan:
- does not address a malfunction that has occurred;
  - fails to provide for the operation of the emissions 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
  - does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

The permittee shall revise the operation and maintenance plan if required by NEDO.

Within 45 days of an occurrence of a malfunction, the permittee shall revise the operation and maintenance plan if it fails to adequately address that malfunction. If the actions taken during the malfunction are not specified in the operation and maintenance plan, the permittee shall record the alternate actions and within 2 working days of these actions report them to the NEDO, unless the permittee makes alternate reporting arrangements in advance. The report shall be followed by a letter to NEDO within 7 working days after the end of the event.

The permittee shall maintain the operation and maintenance plan and make it available for inspection for as long as the sources operate or until they are no longer subject to this rule. If the operation and maintenance plan is revised, the superseded versions shall be maintained for inspection for 5 years after each revision to the plan.

The permittee shall not use a reducing agent to change the form of the chromium from hexavalent to trivalent in order to meet standards that apply to chromic acid baths.

The permittee shall comply with the record keeping and reporting requirements associated with the operation and maintenance plan as identified in 40 CFR 63.346(b) and 63.347(g), respectively.

9. The composite mesh-pad system shall be operated within +/- 1 inch of water column of the pressure drop value of 8.9 inches of water column established during the initial performance test.

## III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the composite mesh-pad control system when the emissions unit is in operation. The pressure drop monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall monitor and record the pressure drop across the composite mesh-pad control system once each day that the emission unit is operating. The units for pressure drop shall be inches of water column.
- The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR, Part 63, Subpart A and maintain all of the applicable records/documents listed in 40 CFR 63.346(b) of Subpart N.

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee also shall maintain the following records:
  - a. Inspection records for the composite mesh-pad control system 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, the composite mesh-pad control system, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of the process, the composite mesh-pad control system, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, the composite mesh-pad control system, 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, the composite mesh-pad control system, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements section of this permit and 40 CFR 63.9 and 63.10.
  - m. Records of the actual cumulative rectifier capacity of the hard chromium electroplating tanks expended during each month of the reporting period, and the total capacity expended to date for a reporting period.
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### IV. Reporting Requirements

1. The permittee shall report to NEDO the results of any performance test conducted. The report shall be submitted no later than 90 days following the completion of the performance test.
2. The permittee shall prepare an ongoing compliance status report semiannually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to NEDO 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.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.
  - i. A description of any changes in monitoring, processes, or controls since the last reporting period.
  - j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
  - k. The date of the report.
  - l. The actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis.

The report shall be completed annually and retained on site and made available to NEDO upon request.
3. The permittee shall submit semiannual reports if the following conditions are met:
  - a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
  - b. the total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.
4. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce the reporting frequency is approved.
5. NEDO 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.

#### IV. Reporting Requirements (continued)

6. 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., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR, Part 63, Subpart A and others listed in this permit.
  - c. NEDO does not object to reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies NEDO in writing of its intention to make such a change, and NEDO does not object to the intended change. In deciding whether to approve a reduced reporting frequency, NEDO may review information concerning the facility's entire previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is disapproved, the permittee will be notified in writing within 45 days after NEDO receives notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.
    - ii. As soon as the monitoring data show that the facility is not in compliance with the relevant emission limit, the frequency of reporting shall revert to quarterly, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.
7. The permittee shall submit quarterly written reports that (a) identify all days during which any visible particulate emissions from any stack serving this emission unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to NEDO by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter.

#### V. Testing Requirements

1. Emissions Limitation:  
The maximum concentration of total chromium in the exhaust gas stream from this emissions unit shall not exceed 0.0002949 lb of chromium per hour or 0.015 mg of chromium per dscm.

Applicable Compliance Method:

Performance tests were conducted on October 16, 1997, and the results showed an average chromium emission rate of 0.0048 mg/dscm for this emissions unit. If required, additional performance testing shall be conducted in accordance with the test methods and procedures specified in 40 CFR, Part 63, Subpart N. Ongoing compliance shall be based upon the established operating parameters for the pressure drop across the composite mesh-pad emission control system.

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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