



State of Ohio Environmental Protection Agency

Street Address:

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

08/21/02

**CERTIFIED MAIL**

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

08-57-08-0148  
Delphi Chassis Systems, Kettering Operations  
JoAnne C. Rau  
P.O. Box 1042  
Dayton, OH 45401-1042

Dear JoAnne C. Rau:

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 RAPCA 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 RAPCA.**

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA (electronically submitted)  
File, DAPC PMU  
RAPCA



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 08/21/02

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: 08-57-08-0148 to:

Delphi Chassis Systems, Kettering Operations

Delphi Chassis Systems, Kettering Operat

2000 Forrer Boulevard

Kettering, OH 45420

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

B001 (Boiler #1 ) Boiler for process steam and heat	Painting and drying line	P056 (#2 Strut Chrome Plater) Chrome plater
B002 (Boiler #2) Boiler for process steam and heat	K020 (Maintenance Paint Booth) Maintenance spray paint booth	P058 (#3 Strut Chrome Plater) Chrome plater
B003 (Boiler #3 ) Boiler for process steam and heat	K023 (Short Line Dip Coating Operation) Painting and drying line	P079 (#4 Strut Chrome Plater) Chrome plater
B004 (Boiler #4) Boiler for process steam and heat	K029 (F-Shock Paint Line) Painting and drying line	P092 (#2 Shock Chrome Plater ) Chrome plater
B005 (Plant 17 Generator) Generator	K031 (Electrodeposition Paint System) Electrodeposition painting system	P094 (#11 Anneal Furnace) Annealing furnace
B006 (Plant 18 Generator) Generator	P032 (#1 Shock Chrome Plater) Chrome plater	T013 (Storage Tank System- 50,000 Gals ) Storage tank
K003 (3K19 Electrostatic Coating Operation) Painting and drying line	P041 (#1 Strut Chrome Plater) Chrome plater	T015 (Storage Tank System- 90,000 Gals) Storage tank
K005 (3K21 Electrostatic Coating Operation)		

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:

RAPCA  
451 West Third Street  
PO Box 972  
Dayton, OH 45422  
(937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

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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. 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. **For emission limitations, operational restrictions, and control device operating parameter limitations:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring and record keeping requirements specified in this permit; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the

deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These 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 (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

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

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

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

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

## **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 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. 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.
- 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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

None

### B. State Only Enforceable Section

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

B007: Plant 12 Generator  
B008: Powerhouse Generator  
B009: Plant 11 Generator  
B010: Plant 14 Generator  
B011: Fire Pumphouse Generator  
F001: Roads/Parking Lots  
G001: Fuel Dispensing Tanks with Stage II  
K028: Spray Paint System  
L007: Cold Cleaner (non-halogenated cleaners)  
L008: Cold Cleaner (non-halogenated cleaners)  
P033: Tube Pickling and Phosphating  
P038: Tin Plating  
P042: Pickle, Phosphate, Lubrication Systems  
P049: Hoist Plater  
P052: Spring Grinding  
P054: Piston Stripper  
P057: Zinc Phosphating on steel  
P064: EAD Weld Line  
P067: Aluminum Die Casting  
P069: Udylite Phosphate  
P072: J1-J2 Welder Exhaust  
P073: R-Module Arc Welding Operation  
P083: Laser Cutting Model Shop  
P086: Stress Relieving Oven #6  
P087: Stress Relieving Oven #7  
P088: Stress Relieving Oven #8  
P093: RTD-CCR-SLA Arc Welding Operation  
P096: Lab Equipment  
P097: Model Shop  
P100: Spring Heat Treat Oven  
P103: #2 RTD-CCR-SLA Arc Welding Operation  
P105: East Heat Treat Furnace  
P106: West Heat Treat Furnace  
P116: Monotube Powder Paint System

**B. State Only Enforceable Section (continued)**

P117: Electrodeposition Pretreatment System  
P118: #1 Autophoretic Paint System  
P119: #2 & #3 Autophoretic Paint System  
P120: Strut Autophoretic Paint System  
P901: Ash & Coal Handling  
T009: 6000-Gallon Paint Tank  
T010: 6000-Gallon Paint Tank  
T018: Petroleum Blend Storage Tank  
T019: Industrial Oil Storage Tank  
Z001: Cold Cleaner (non-halogenated cleaners)  
Z002: Cold Cleaner (non-halogenated cleaners)  
Z003: Cold Cleaner (non-halogenated cleaners)  
Z004: Cold Cleaner (non-halogenated cleaners)  
Z005: Cold Cleaner (non-halogenated cleaners)  
Z006: Cold Cleaner (non-halogenated cleaners)  
Z007: Parts Washer (detergent)  
Z008: Parts Washer (detergent)  
Z009: Parts Washer (detergent)  
Z010: Cold Cleaner (non-halogenated cleaners)  
Z011: Cold Cleaner (non-halogenated cleaners)  
Z012: Cold Cleaner (non-halogenated cleaners)  
Z013: Cold Cleaner (non-halogenated cleaners)  
Z014: Cold Cleaner (non-halogenated cleaners)  
Z015: Cold Cleaner (non-halogenated cleaners)  
Z016: Cold Cleaner (non-halogenated cleaners)  
Z017: Cold Cleaner (non-halogenated cleaners)  
Z018: Cold Cleaner (non-halogenated cleaners)  
Z019: Stabilizer Bracket Welder  
Z020: Shock Basecup Welder  
Z021: Reservoir Tube Assy. Ring Welder 1  
Z022: Reservoir Tube Assy. Ring Welder 2  
Z024: #3 Spring Seat & Brkt. Welder 1  
Z025: #3 Spring Seat & Brkt. Welder 2  
Z027: #3 Wash & Leak Test  
Z029: #3 P & R Assy Washer  
Z030: #3 Brkt & Insert Welder  
Z031: #3 Rebound Stop Welder  
Z033: #2 Spring Seat & Brkt. Welder 1  
Z034: #2 Spring Seat & Brkt. Welder 2  
Z035: #2 Wash & Leak Test  
Z037: #2 P & R Assy. Washer

**B. State Only Enforceable Section (continued)**

- Z038: #2 Brkt & Insert Welder
- Z039: #2 Rebound Stop Welder
- Z040: Strut Autophor. Paint Sys. #4
- Z041: Strut Autophor. Paint Sys. #3
- Z042: Strut Autophor. Paint Sys. #2
- Z044: #5 Spring Seat & Brkt. Welder 1
- Z045: #5 Spring Seat & Brkt. Welder 2
- Z046: #5 Slot Welder
- Z047: #5 Res. Assy., Wash & Leak Test
- Z049: #5 P & R Assy. Washer
- Z050: #5 Brkt & Insert Welder
- Z051: #5 Rebound Stop Welder
- Z052: Monotube Chip Washer
- Z053: Formed Tube Washer
- Z054: Welded Tube Washer
- Z055: Damper Parts Washer
- Z056: Cold Cleaner
- Z057: Cold Cleaner
- Z059: Res. Tube Washer
- Z060: Res. Assy. Wash & Leak Test
- Z062: Shock 1 Reservoir Tube Washer
- Z063: Shock 1 P & R Washer
- Z064: Shock 1 Ring Welder
- Z065: Shock 1 Mount Welder
- Z066: Shock 1 Seal Cover Welder
- Z067: Shock 1 Piston Weld
- Z068: Shock 1 Basecup Welder
- Z070: Grinder Coolant
- Z071: #7 Stab. Bar Welder
- Z072: #7 Res. Assy. Tube Welder
- Z073: #7 Spring Seat & Brkt. Welder
- Z074: #7 Slot Welder
- Z075: #7 Brkt & Insert Welder
- Z077: Wash & Leak Test
- Z080: J Can Rebound Stop Welder
- Z081: Toyota Spring Seat Welder
- Z082: Toyota Basecup Welder
- Z083: Toyota Brake Hose Welder
- Z084: Toyota Stab. Brkt. Welder
- Z085: Perc use in lab

**B. State Only Enforceable Section (continued)**

Z086: Clevis Brkt. Welder  
Z087: CTP Oil Separation System  
Z089: Prepaint Washer  
Z090: Shock Re-Op Stripper  
Z091: Parts Washer (detergent)  
Z092: Piston Washer  
Z093: Pressure Valve Washer  
Z094: Conveyor Tube Washers  
Z096: #1 Parts Washer (detergent)  
Z097: #2 Parts Washer (detergent)  
Z098: Batch Washer  
Z099: 1000/1250 Headers Washers  
Z100: Acme Fab Parts Washer  
Z101: Cap Header Washer  
Z102: Small Parts Washer  
Z103: Jen Fab Washer  
Z104: Metering Pin Washer  
Z105: Parts Washer (detergent)  
Z106: Rattle Washer  
Z107: Shock Washer  
Z108: CCR Parts Washer  
Z109: New Britain Washer  
Z110: Siarto Washer  
Z111: Small Parts Washer  
Z112: Strut Washer  
Z115: Make Up Air Units, (2)  
Z116: Unit Heaters  
Z117: Basecup Welders (6)  
Z118: Ransohoff Washer  
Z119: Ransohoff Washer  
Z120: Plastic Mold Machine  
Z121: Electric Oven  
Z122: PI 14 Cafe. HVAC Unit  
Z123: Cold Cleaner (non-halogenated cleaners)  
Z124: Cold Cleaner (non-halogenated cleaners)  
Z126: Cold Cleaner (non-halogenated cleaners)  
Z127: Cold Cleaner (non-halogenated cleaners)  
Z128: Cold Cleaner (non-halogenated cleaners)  
Z129: Cold Cleaner (non-halogenated cleaners)

**B. State Only Enforceable Section (continued)**

Z130: Cold Cleaner (non-halogenated cleaners)  
Z131: #6 Res. Assy. Wash & Leak Test  
Z133: #6 P & R Assy. Washer  
Z134: #6 Brkt & Insert Welder  
Z135: #6 Spring Seat & Brkt. Weld 1  
Z136: #6 Spring Seat & Brkt. Weld 2  
Z138: #6 Stab. Bar Welder  
Z139: #6 Rebound Stop Welder  
Z137: #6 Slot Welder  
Z140: #4 Res. Assy. Wash & Leak Test  
Z143: #4 Rebound Stop Welder  
Z144: #4 Spring Seat & Brkt. Welder 1  
Z145: #4 Spring Seat & Brkt. Welder 2  
Z146: #4 Piston Weld  
Z150: Saturn Cell 2, Spring Seat Weld  
Z151: Saturn Cell 2, Brkt. Weld  
Z152: Battery Chargers  
Z153: Salt Spray  
Z154: Saturn Cell 1, Spring Seat Weld  
Z155: Saturn Cell 1, Bracket Weld  
Z156: Cold Cleaner (non-halogenated cleaners)  
Z157: Cold Cleaner (non-halogenated cleaners)  
Z158: Cold Cleaner (non-halogenated cleaners)  
Z159: Cold Cleaner (non-halogenated cleaners)  
Z160: Cold Cleaner (non-halogenated cleaners)  
Z161: Cold Cleaner (non-halogenated cleaners)  
Z163: Flex Auto #3 - Res. Tube Washer  
Z164: Flex Auto #3 - P & R Washer  
Z165: Flex Auto #3 - Basecup Welder  
Z166: Flex Auto #3 - Ring Welder  
Z167: Flex Auto #3 - Top Mount Welder  
Z168: Flex Auto #3 - Piston Welder  
Z169: Flex Auto #3 - Seam Welder  
Z173: Flex Auto #4 - Basecup Welder  
Z174: Flex Auto #4 - Ring Welder  
Z175: Flex Auto #4 - Seam Welder  
Z176: Flex Auto #4 - Piston Welder  
Z178: Corn Cob Deburr  
Z179: Monotube Dampers - Parts Washer  
Z180: Bootline #1 - Fitting Weld

**B. State Only Enforceable Section (continued)**

Z181: Bootline #1 - Dust Tube Weld  
Z182: Bootline #1 - Ring Weld  
Z183: Bootline #2 - Ring Weld  
Z184: Bootline #2 - Fitting Weld  
Z185: Bootline#2 - Dust Tube Weld  
Z186: Strut #1 - Spring Seat & Brkt Welder #1  
Z187: Strut #1 - Spring Seat & Brkt Welder #2  
Z188: Strut #1 - Res. Assy Wash & Leak Test  
Z190: Strut #1 - P & R Washer  
Z191: Strut #1 - Bracket & Insert Welder  
Z192: Strut #1 - Rebound Stop Welder  
Z193: Hanger Stripper, K003 and K005  
Z194: Bar Mount Assy. Washers (2)  
Z195: Small Acme Washers (2)  
Z196: Resistance Welder - ATM Lab  
Z197: Piston Washer  
Z198: Flex Auto #2 - Ring Welder  
Z199: Flex Auto #2 - Top Mount Welder  
Z200: Flex Auto #2 - Base Cup Welder  
Z201: Flex Auto #2 - Piston Welder  
Z202: Flex Auto #2 - Seam Welder  
Z203: Flex Auto #2 - Top Seam Welder  
Z204: Monotube - Rebound Stop Welder  
Z205: Monotube - Element Assy Welder  
Z206: Monotube - Aux. Arc Welder  
Z207: Monotube - Mount Welder  
Z208: Monotube - Basecup Welder  
Z209: Monotube - Resistance Welder  
Z210: Autophoretic Lab Hoods (6)

2. 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.
3. The permittee is hereby notified that this permit and all Agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

**Emissions Unit ID:** Boiler #1 (B001)  
**Activity Description:** Boiler for process steam and heat

#### 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>
80 mmBtu/hr, natural gas/No. 2 oil fired boiler	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions (PE) per mmBtu actual heat input
	OAC rule 3745-18-63(Q)(1)	0.5 pound of sulfur dioxide emissions per mmBtu actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.I. above.
- The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

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

- For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
- The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.
- For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

1. The permittee shall notify the Director (the RAPCA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from Sections A.III.1 and 2 above. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

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

- 1.a Emission Limitation-  
0.020 pound PE per mmBtu actual heat input

Applicable Compliance Method-

For the use of natural gas, compliance may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.08 mm cubic feet/hr) by the AP-42 emission factor for natural gas (1.9 lbs PE/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the emissions unit (80 mmBtu/hr).

For the use of No. 2 oil, compliance may be demonstrated by multiplying the maximum fuel oil capacity of the emissions unit (571 gallons/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (80 mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- 1.b Emission Limitation-  
0.5 pound SO<sub>2</sub> per mmBtu actual heat input

Applicable Compliance Method-

When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

- 1.c Emission Limitation-  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

#### **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:** Boiler #2 (B002)  
**Activity Description:** Boiler for process steam and heat

#### 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>
80 mmBtu/hr, natural gas/No. 2 oil fired boiler	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions (PE) per mmBtu actual heat input
	OAC rule 3745-18-63(Q)(1)	0.5 pound of sulfur dioxide emissions per mmBtu actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.I. above.
- The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

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

- For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
- The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.
- For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

1. The permittee shall notify the Director (the RAPCA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from Sections A.III.1 and 2 above. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

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

- 1.a Emission Limitation-  
0.020 pound PE per mmBtu actual heat input

Applicable Compliance Method-

For the use of natural gas, compliance may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.08 mm cubic feet/hr) by the AP-42 emission factor for natural gas (1.9 lbs PE/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the emissions unit (80 mmBtu/hr).

For the use of No. 2 oil, compliance may be demonstrated by multiplying the maximum fuel oil capacity of the emissions unit (571 gallons/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (80 mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- 1.b Emission Limitation-  
0.5 pound SO<sub>2</sub> per mmBtu actual heat input

Applicable Compliance Method-

When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

- 1.c Emission Limitation-  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

#### **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:** Boiler #3 (B003)  
**Activity Description:** Boiler for process steam and heat

#### 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>
coal-fired spreader stoker boiler-150 mmBtu/hr; Boiler #3, with cyclone and baghouse in series	OAC rule 3745-18-63(Q)(2)	1.2 pounds sulfur dioxide (SO <sub>2</sub> ) per mmBtu actual heat input
	OAC rule 3745-31-05(A)(3) PTI 08-057	0.14 pound particulate emissions (PE) per mmBtu actual heat input  The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-63(Q)(2), 3745-17-07(A), 3745-21-08(B) and 3745-23-06(B).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See Section A.I.2.b.

##### 2. Additional Terms and Conditions

- The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 08-057.

##### II. Operational Restrictions

- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I.1. above.

## II. Operational Restrictions (continued)

2. The pressure drop across the baghouse shall be maintained within the range of 2 to 12 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.
2. Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the RAPCA.
3. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for ash content, sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu) for the composite sample.
4. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

5. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the RAPCA upon request.
6. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
7. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, provisions for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
8. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c of the General Terms and Conditions of this permit, that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in A.II.2 of this permit.
2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the RAPCA) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the RAPCA) documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall notify the Director (the RAPCA) in writing of any record that shows a deviation of the allowable sulfur dioxide limitation (lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section A.III.3 above. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the deviation occurs.

#### V. Testing Requirements

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

- 1.a Emission Limitation-  
1.2 pounds of sulfur dioxide per mmBtu actual heat input

Applicable Compliance Method-

The permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation above based upon the results of stack testing conducted in accordance with OAC rule 3745-18-04(D)(1) and also the record keeping requirements specified in Section A.III.3 and the use of the equation contained in OAC rule 3745-18-04(F)(1).

- 1.b Emission Limitation-  
0.14 pound PE per mmBtu actual heat input

Applicable Compliance Method-

The permittee shall demonstrate compliance with the PE limitation above based upon the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

## V. Testing Requirements (continued)

### 1.c Emissions Limitation-

Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method-

Compliance may be demonstrated based on visible emission evaluations, using the methods and procedures specified in USEPA Reference Method 9, taken at any time the emissions unit is in operation by qualified observers certified in accordance with USEPA RM 9, 40 CFR, Part 60, Appendix A, section 3., Qualifications and Testing. The frequency of USEPA RM 9 evaluations shall be at a minimum semi-monthly. For any periods of time where the COM is out of service for 24 hours or longer, the minimum RM 9 evaluation frequency shall be not less than daily.

### 2. Emission Testing:

**2.a** Approximately 2.5 years after permit issuance and within 6 months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for the emissions unit to demonstrate compliance with the allowable mass emission rates for PE. The emission tests shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(9). The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (the RAPCA).

**2.b** Approximately 2.5 years after permit issuance, the permittee shall conduct, or have conducted, performance testing on the air contaminant emissions unit in order to demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub>. The emission tests shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-18-04(D)(1). The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (the RAPCA).

**2.c** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the Director (the RAPCA). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the RAPCA's) refusal to accept the results of the emission test(s).

Personnel from the Director (the RAPCA) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed and submitted to the Director (the RAPCA) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the RAPCA).

## 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:** Boiler #4 (B004)  
**Activity Description:** Boiler for process steam and heat

#### 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>
150 mmBtu/hr, coal spreader stoker boiler #4, #2 fuel oil, and natural gas, with cyclone and baghouse in series	OAC rule 3745-18-63(Q)(2)	1.2 pounds sulfur dioxide (SO <sub>2</sub> ) per mmBtu actual heat input
	OAC rule 3745-31-05(A)(3) PTI 08-144	0.06 pound particulate emissions (PE) per mmBtu actual heat input, when burning coal
		83.8 pounds nitrogen oxides (NO <sub>x</sub> )/hour
		See Section A.I.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-63(Q)(2), 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), and 3745-17-10(B).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-10(B)(1)	0.020 pound PE per mmBtu actual heat input, when firing only natural gas and/or #2 fuel oil
OAC rules 3745-21-08(B) and 3745-23-06(B)	See Section A.I.2.b.	

## 2. Additional Terms and Conditions

- 2.a This NO<sub>x</sub> emission standard was established pursuant to the Prevention of Significant Deterioration requirements specified under 40 CFR 52.21.
- 2.b The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 08-144.

## II. Operational Restrictions

- 1. The quality of the coal burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.1. above.
- 2. The quality of the oil burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.I. above.
- 3. The pressure drop across the baghouse shall be maintained within the range of 2 to 12 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.
- 2. Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.
- 3. The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, heat content, and the sulfur dioxide emission rate, in lb/mmBtu.
- 4. For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
- 5. The permittee shall perform or require the supplier to perform analyses of the oil for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.
- 6. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

7. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

8. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
9. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, provisions for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
10. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c of the General Terms and Conditions of this permit, that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in A.II.3 of this permit.
2. The permittee shall notify the Director (the RAPCA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Sections A.III.3 and 4 above. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the deviation occurs.

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

3. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the RAPCA) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the RAPCA) documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

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

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

- 1.a Emission Limitation-  
1.2 pounds SO<sub>2</sub> per mmBtu actual heat input

Applicable Compliance Method-

When burning coal, compliance with the SO<sub>2</sub> emission limitation above shall be based upon the results of stack testing conducted in accordance with OAC rule 3745-18-04(D)(1) and also the record keeping requirements specified in Sections A.III.2 and 3, and the use of the equation contained in OAC rule 3745-18-04(F)(1).

When burning #2 fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

When burning natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

- 1.b Emission Limitation-  
0.06 pound PE per mmBtu actual heat input, when burning coal

Applicable Compliance Method-

compliance with the PE limitation above shall be based upon the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

## V. Testing Requirements (continued)

- 1.c** Emission Limitation -  
0.020 pound PE per mmBtu actual heat input, when firing natural gas and/or #2 fuel oil

Applicable Compliance Method -

For the use of natural gas, compliance may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cubic feet/hr) by the AP-42 emission factor for natural gas (1.9 lbs PE/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

For the use of No. 2 oil, compliance may be demonstrated by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- 1.d** Emissions Limitation-  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method-

Compliance may be demonstrated based on visible emission evaluations, using the methods and procedures specified in USEPA Reference Method 9, taken at any time the emissions unit is in operation by qualified observers certified in accordance with USEPA RM 9, 40 CFR, Part 60, Appendix A, section 3., Qualifications and Testing. The frequency of USEPA RM 9 evaluations shall be at a minimum semi-monthly. For any periods of time where the COM is out of service for 24 hours or longer, the minimum RM 9 evaluation frequency shall be not less than daily.

- 1.e** Emission Limitation-  
83.8 pounds NOx/hr

Applicable Compliance Method-

The permittee shall demonstrate compliance with the NOx emission limitation above based upon the results of stack testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

When burning coal, compliance may also be demonstrated by multiplying the maximum hourly coal burn rate of 6.58 tons (based upon the minimum heat content of 22.8 mmBtu/ton coal) by the emission factor of 11 lbs NOx/ton coal, AP-42, Section 1.1, Table 1.1-3 (revised 9/98).

When burning #2 fuel oil, compliance may also be demonstrated by multiplying the maximum hourly oil burn rate of the emissions unit (gallons/hr) by the emission factor from AP-42, Section 1.3, Table 1.3-1 (revised 9/98) of 24 lbs NOx/1000 gallons oil.

When burning natural gas, compliance may also be demonstrated by multiplying the maximum hourly natural gas burn rate of the emissions unit (mm cu feet/hr) by the emission factor from AP-42, Section 1.4, Table 1.4-1 (revised 7/98) of 280 lbs NOx/mm cu. ft natural gas.

- 2.** Emissions Testing:

- 2.a** Approximately 2.5 years after permit issuance and within 6 months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing on the air contaminant emissions unit in order to demonstrate compliance with the allowable rate for PE. The emissions tests shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (the RAPCA).

## **V. Testing Requirements (continued)**

- 2.b** Approximately 6 months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing on the air contaminant emissions unit in order to demonstrate compliance with the allowable mass emission rate for SO<sub>2</sub>. The emissions test shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-18-04(D)(1). The test shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- 2.c** Approximately 2.5 years after permit issuance, the permittee shall conduct, or have conducted, performance testing on the air contaminant emissions unit in order to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub>. The emissions test shall be conducted in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 through 7E. The test shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (the RAPCA).
- 2.d** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the Director (the RAPCA). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the RAPCA's) refusal to accept the results of the emission test(s).

Personnel from the Director (the RAPCA) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed and submitted to the Director (the RAPCA) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the RAPCA).

## **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:** Plant 17 Generator (B005)

**Activity Description:** Generator

#### 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>
Plant #17, 33.6 gallon/hr, kerosene emergency generator	OAC rule 3745-17-11(B)(5)(b)	0.35 pound particulate emissions (PE) per mmBtu of actual heat input (See Section A.I.2.b.)
	OAC rule 3745-31-05(A)(3) PTI 08-2753	0.062 pounds PE per mmBtu of actual heat input (See Section A.I.2.c.) PE: 1.13 lbs/hr and 0.06 TPY;
		sulfur dioxide (SO <sub>2</sub> ): 1.05 lbs/hr and 0.06 TPY;
		nitrogen oxides (NO <sub>x</sub> ): 15.76 lbs/hr and 0.84 TPY;
		volatile organic compounds (VOC): 1.08 lbs/hr and 0.06 TPY; and
		carbon monoxide (CO): 3.43 lbs/hr and 0.18 TPY.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(b), 3745-21-08(B), 3745-23-06(B), and 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 08-2753	NO <sub>x</sub> : 140.7 lbs/month
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-18-06(G)	exempt, pursuant to OAC rule 3745-18-06(B) (See A.I.2.e.)

## 2. Additional Terms and Conditions

- 2.a The lbs/hr allowable emission rates (for each pollutant) were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.c This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.d The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 08-2753.
- 2.e Since the rated heat input capacity for this emissions unit is less than 10 mmBtu/hr, this emissions unit is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(B).

## II. Operational Restrictions

- 1. The maximum monthly kerosene usage for this emissions unit shall not exceed 300 gallons.
- 2. The maximum annual kerosene usage for this emissions unit shall not exceed 3,600 gallons.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall calculate and maintain each month the following information for this emissions unit:
  - a. the numbers of gallons of kerosene burned; and
  - b. the NO<sub>x</sub> emissions, in pounds, calculated by multiplying the monthly gallons usage of kerosene, from section A.III.1.a above, by the NO<sub>x</sub> emission factor of 469 lbs/1000 gallons\* of kerosene burned.

\* Based on USEPA's FIRE, Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants.

- 2. The permittee shall calculate and maintain each year records of the number of gallons of kerosene burned (this is calculated by summing the numbers of the monthly gallons burned, from section A.III.1.a above, for the calendar year).

## IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that identify the following:
  - a. each month during which the kerosene usage exceeded 300 gallons, and the actual kerosene usage rate for each such month; and
  - b. each month during which the NO<sub>x</sub> emissions exceeded 140.7 pounds, and the actual NO<sub>x</sub> emissions for each such month.
- 2. The permittee shall submit annual reports that specify the total kerosene usage rate, i.e., gallons, from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

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

1.a Emission Limitation:  
PE shall not exceed 0.35 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.062 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (revised 10/96).

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:  
PE shall not exceed 0.062 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.062 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (revised 10/96).

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

1.c Emission Limitations-  
1.13 lbs/hr PE  
1.05 lbs/hr SO<sub>2</sub>  
15.76 lbs/hr NO<sub>x</sub>  
1.08 lbs/hr VOC  
3.43 lbs/hr CO

Applicable Compliance Method-

Compliance with the limitations above may be determined by multiplying the maximum hourly fuel usage rate (33.6 gallons/hr) by the appropriate SCC 2-02-009-02 emission factor\* for each pollutant.

If required, the permittee shall demonstrate compliance with the limitations above in accordance with the following:

- i. PE, Methods 1 - 5 of 40 CFR, Part 60, Appendix A;
- ii. SO<sub>2</sub>, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;
- iii. NO<sub>x</sub>, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;
- iv. VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A; and
- v. CO, Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

\* The emissions factors, which are based on the USEPA's FIRE, Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, are:

- i. PE = 33.5 lbs/1000 gallons;
- ii. SO<sub>2</sub> = 31.2 lbs/1000 gallons;
- iii. NO<sub>x</sub> = 469 lbs/1000 gallons;
- iv. VOC = 2.1 lbs/1000 gallons; and
- v. CO = 102 lbs/1000 gallons.

## **V. Testing Requirements (continued)**

- 1.d** Emission Limitation-  
140.7 lbs NOx/month

Applicable Compliance Method-

Compliance shall be determined based on the record keeping requirements in section A.III.1 of the terms and conditions of this permit.

- 1.e** Emission Limitations-  
0.06 TPY PE  
0.06 TPY SO<sub>2</sub>  
0.84 TPY NO<sub>x</sub>  
0.06 TPY VOC  
0.18 TPY CO

Applicable Compliance Method-

Compliance with the emission limitations above may be determined by multiplying the maximum allowable annual usage rate of 3,600 gallons of kerosene by the appropriate emission factor for each pollutant (see section A.V.1.c above), and then dividing by 2000.

- 1.f** Usage Limitations-  
300 gallons kerosene/month  
3600 gallons kerosene/year

Applicable Compliance Method-

Compliance shall be determined based on the record keeping requirements in sections A.III.1 and 2 of the terms and conditions of this permit.

## **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:** Plant 18 Generator (B006)

**Activity Description:** Generator

#### 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>
Plant #18, 42.3 gallon/hr, kerosene emergency generator	OAC rule 3745-17-11(B)(5)(b)	0.35 pound particulate emissions (PE) per mmBtu of actual heat input (See Section A.I.2.b.)
		0.062 pounds PE per mmBtu of actual heat input (See Section A.I.2.c.)
	OAC rule 3745-31-05(A)(3) PTI 08-2753	PE: 1.42 lbs/hr and 0.08 TPY;
		sulfur dioxide (SO <sub>2</sub> ): 1.32 lbs/hr and 0.07 TPY;
		nitrogen oxides (NO <sub>x</sub> ): 19.84 lbs/hr and 1.06 TPY;
		volatile organic compounds (VOC): 1.36 lbs/hr and 0.07 TPY; and
		carbon monoxide (CO): 4.31 lbs/hr and 0.23 TPY.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(b), 3745-21-08(B), 3745-23-06(B), and 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 08-2753	NO <sub>x</sub> : 176.8 lbs/month
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See Section A.I.2.d.
OAC rule 3745-18-06(G)	exempt, pursuant to OAC rule 3745-18-06(B) (See A.I.2.c.)	

## 2. Additional Terms and Conditions

- 2.a The lbs/hr allowable emission rates (for each pollutant) were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.c This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.d The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 08-2753.
- 2.e Since the rated heat input capacity for this emissions unit is less than 10 mmBtu/hr, this emissions unit is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(B).

## II. Operational Restrictions

- 1. The maximum monthly kerosene usage for this emissions unit shall not exceed 377 gallons.
- 2. The maximum annual kerosene usage for this emissions unit shall not exceed 4,526 gallons.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall calculate and maintain each month the following information for this emissions unit:
  - a. the numbers of gallons of kerosene burned; and
  - b. the NO<sub>x</sub> emissions, in pounds, calculated by multiplying the monthly gallons usage of kerosene, from section A.III.1.a above, by the NO<sub>x</sub> emission factor of 469 lbs/1000 gallons\* of kerosene burned.

\* Based on USEPA's FIRE, Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants.

- 2. The permittee shall calculate and maintain each year records of the number of gallons of kerosene burned (this is calculated by summing the numbers of the monthly gallons burned, from section A.III.1.a above, for the calendar year).

## IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that identify the following:
  - a. each month during which the kerosene usage exceeded 377 gallons, and the actual kerosene usage rate for each such month; and
  - b. each month during which the NO<sub>x</sub> emissions exceeded 176.8 pounds, and the actual NO<sub>x</sub> emissions for each such month.
- 2. The permittee shall submit annual reports that specify the total kerosene usage rate, i.e., gallons, from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

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

1.a Emission Limitation:  
PE shall not exceed 0.35 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.062 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (revised 10/96).

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:  
PE shall not exceed 0.062 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.062 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (revised 10/96).

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

1.c Emission Limitations-  
1.42 lbs/hr PE  
1.32 lbs/hr SO<sub>2</sub>  
19.84 lbs/hr NO<sub>x</sub>  
1.36 lbs/hr VOC  
4.31 lbs/hr CO

Applicable Compliance Method-

Compliance with the limitations above may be determined by multiplying the maximum hourly fuel usage rate (33.6 gallons/hr) by the appropriate SCC 2-02-009-02 emission factor\* for each pollutant.

If required, the permittee shall demonstrate compliance with the limitations above in accordance with the following:

- i. PE, Methods 1 - 5 of 40 CFR, Part 60, Appendix A;
- ii. SO<sub>2</sub>, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;
- iii. NO<sub>x</sub>, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;
- iv. VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A; and
- v. CO, Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

\* The emissions factors, which are based on the USEPA's FIRE, Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, are:

- i. PE = 33.5 lbs/1000 gallons;
- ii. SO<sub>2</sub> = 31.2 lbs/1000 gallons;
- iii. NO<sub>x</sub> = 469 lbs/1000 gallons;
- iv. VOC = 2.1 lbs/1000 gallons; and
- v. CO = 102 lbs/1000 gallons.

## **V. Testing Requirements (continued)**

- 1.d** Emission Limitation-  
176.8 lbs NOx/month

Applicable Compliance Method-

Compliance shall be determined based on the record keeping requirements in section A.III.1 of the terms and conditions of this permit.

- 1.e** Emission Limitations-  
0.08 TPY PE  
0.07 TPY SO<sub>2</sub>  
1.06 TPY NO<sub>x</sub>  
0.07 TPY VOC  
0.23 TPY CO

Applicable Compliance Method-

Compliance with the emission limitations above may be determined by multiplying the maximum allowable annual usage rate of 4,526 gallons of kerosene by the appropriate emission factor for each pollutant (see section A.V.1.c above), and then dividing by 2000.

- 1.f** Usage Limitations-  
377 gallons kerosene/month  
4,526 gallons kerosene/year

Applicable Compliance Method-

Compliance shall be determined based on the record keeping requirements in sections A.III.1 and 2 of the terms and conditions of this permit.

## **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:** 3K19 Electrostatic Coating Operation (K003)

**Activity Description:** Painting and drying line

#### 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>
shock absorber paint line 3K19 (electrostatic spray with water wash and dry filtration)	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity from the booth and oven stacks, as a 6-minute average, except as provided by the rule

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall operate the water wash and dry filtration system when this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC emission limitation specified under Section A.I.1. on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The VOC content of each coating employed, in lbs/gallon, excluding water and exempt solvents.
  - c. Documentation that each coating employed meets the composition criteria specified in Section A.II.1 of this permit.
2. The permittee shall document whether or not the water wash and dry filtration system were in service when the emissions unit was in operation.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings with a VOC content that exceeded the VOC limitation specified in Section A.I.1.). The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 30 days following the end of the calendar month.
2. In accordance with Part II - Section A.1.c. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the coatings employed in this emissions unit did not meet the criteria outlined in Section A.II.1 of this permit.
3. The permittee shall notify the Director (RAPCA) in writing of any record showing that the water wash and dry filtration system were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 30 days after the event occurs.

#### V. Testing Requirements

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

- 1.a Emission Limitation-  
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emission Limitation-  
0.551 lb PE/hr

Applicable Compliance Method-

To determine the actual worst case emissions rate for PE, the following equation may be used:

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

$$E = \text{PE rate (lbs/hour)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation -  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

Facility Name: **Delphi Chassis Systems, Kettering Operations**  
Facility ID: **08-57-08-0148**  
Emissions Unit: **3K19 Electrostatic Coating Operation (K003)**

## **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:** 3K21 Electrostatic Coating Operation (K005)

**Activity Description:** Painting and drying line

#### 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>
shock absorber paint line 3K21 (electrostatic spray with water wash and dry filtration)	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity from the booth and oven stacks, as a 6-minute average, except as provided by the rule

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall operate the water wash and dry filtration system when this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC emission limitation specified under Section A.I.1. on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The VOC content of each coating employed, in lbs/gallon, excluding water and exempt solvents.
  - c. Documentation that each coating employed meets the composition criteria specified in Section A.II.1 of this permit.
2. The permittee shall document whether or not the water wash and dry filtration system were in service when the emissions unit was in operation.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings with a VOC content that exceeded the VOC limitation specified in Section A.I.1.). The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 30 days following the end of the calendar month.
2. In accordance with Part II - Section A.1.c. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify each month during which the coatings employed in this emissions unit did not meet the criteria outlined in Section A.II.1 of this permit.
3. The permittee shall notify the Director (RAPCA) in writing of any record showing that the water wash and dry filtration system were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 30 days after the event occurs.

#### V. Testing Requirements

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

- 1.a Emission Limitation-  
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emission Limitation-  
0.551 lb PE/hr

Applicable Compliance Method-

To determine the actual worst case emissions rate for PE, the following equation may be used:

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

$$E = \text{PE rate (lbs/hour)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation -  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

Facility Name: **Delphi Chassis Systems, Kettering Operations**  
Facility ID: **08-57-08-0148**  
Emissions Unit: **3K21 Electrostatic Coating Operation (K005)**

## **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:** Maintenance Paint Booth (K020)

**Activity Description:** Maintenance spray paint booth

#### 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>
Maintenance spray booth: miscellaneous metal parts	OAC rule 3745-21-09(U)(2)(e)	on the days when coating metal parts:  8 gallons maximum daily coating usage (for the coatings used for only the metal parts)
Non-metal parts	OAC rule 3745-21-07(G)(2)	on the days when coating non-metal parts:  8 lbs/hr and 40 lbs/day organic compounds (OC) (for the coatings and photochemically reactive cleanup materials used for only the non-metal parts)
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr, for coating both metal and non-metal parts
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall operate the water wash when this emissions unit is in operation.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The company identification for each coating employed (including whether it is used for metal or non-metal parts) and cleanup material employed (including whether it is used for metal or non-metal parts).
  - b. Documentation on whether or not each cleanup material employed is a photochemically reactive material.
  - c. The volume, in gallons, of each coating and cleanup material employed.
  - d. On the days when coating metal parts, the total volume, in gallons, of all the coatings employed for the coating of metal parts.
  - e. The OC content of each coating and cleanup material employed, in pounds per gallon.
  - f. On the days when coating non-metal parts, the total OC emission rate for all the coatings and photochemically reactive cleanup materials used for the coatings of only non-metal parts, in pounds.
  - g. On the days when coating non-metal parts, the total number of hours the emissions unit was in operation (this is only the number of hours for the coating of non-metal parts).
  - h. On the days when coating non-metal parts, the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials used for the coatings of only non-metal parts, i.e., (h)/(i), in pounds per hour (average).
2. The permittee shall document whether or not the water wash was in service when the emissions unit was in operation.

### IV. Reporting Requirements

1. For the coating of metal parts, the permittee shall notify the Director (the RAPCA) in writing of any daily record showing that the coating line employed more than the allowable maximum daily coating usage limitation of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the exceedance occurs.
2. For the coating of non-metal parts, the permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall notify the Director (the RAPCA) in writing of any record showing that the water wash was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 30 days after the event occurs.
4. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

### V. Testing Requirements

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

## V. Testing Requirements (continued)

- 1.a** Emissions Limitations:  
8 lbs/hour and 40 lbs/day of OC (for the coatings used for only the non-metal parts)

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

If required, compliance with the hourly allowable OC emission limitation shall be demonstrated in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

- 1.b** Emission Limitation-  
8 gallons maximum daily coating usage (for the coatings used for only the metal parts)

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in A.III.1 of this permit.

- 1.c** Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method: Compliance with the hourly PE limitation may be demonstrated by utilizing the following equation:

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

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed.

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

- 1.d** Emission Limitation: Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

## 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:** Short Line Dip Coating Operation (K023)

**Activity Description:** Painting and drying line

#### 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>
prepaint washer, dryoff oven, 1,380-gallon paint dip tank and bake oven	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (See A.II.)
	OAC rule 3745-31-05(A)(3) PTI 08-1289	57.0 TPY VOC, including cleanup  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 08-1289	4.75 tons per month VOC, including cleanup

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- Each material added to the dip tank shall comply with the VOC content limitation, on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each material added to the dip tank.
  - b. The VOC content of each material added to the dip tank, in lbs/gallon, excluding water and exempt solvents.
  - c. The name and identification of each cleanup material employed.
  - d. The VOC content of each cleanup material employed, in pounds per gallon.
  - e. The number of gallons (excluding water and exempt solvents) of each coating material employed.
  - f. The number of gallons of each cleanup material employed.
  - g. The VOC emissions from each coating material employed, in pounds [(III.1.b.) X (III.1.e.)].
  - h. The VOC emissions from each cleanup material employed, in pounds [(III.1.d.) X (III.1.f.)].
  - i. The total VOC emissions from all the coatings and cleanup materials employed, in tons [(summation of (III.1.g.) for all coating materials + summation of (III.1.h.) for all cleanup materials), divided by 2000].

### IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coating materials (i.e., for VOC content) . The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 30 days following the end of the calendar month.
2. In accordance with Section A.1.c. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the monthly VOC emission rate from the coatings and cleanup materials exceeded 4.75 tons, and the actual VOC emission rate for each such month.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

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

- 1.a Emission Limitation-  
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**V. Testing Requirements (continued)**

- 1.b** Emission Limitation-  
4.75 tons VOC/month, including cleanup

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.c** Emission Limitation-  
57.0 TPY VOC, including cleanup

Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements specified in Section A.III.1. of this permit and shall be the sum of the 12 monthly VOC emission rates 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>
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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:** F-Shock Paint Line (K029)

**Activity Description:** Painting and drying line

#### 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>
F-shock paint line (electrostatic spray with water wash and exhaust filter system)	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents (See A.II.2.)
	OAC rule 3745-31-05 (A)(3) PTI 08-1802	126.6 lbs VOC/day, including cleanup
		23.1 TPY VOC, including cleanup
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-17-07(A) and 3745-17-11(B).
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except except as provided by the rule.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The permittee shall operate the water wash and exhaust filter system when this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content, on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating employed.
  - b. The VOC content of each coating employed (in pounds/gallon, excluding water and exempt solvents).
  - c. The name and identification of each cleanup material employed.
  - d. The VOC content of each cleanup material, in pounds per gallon.
  - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
  - f. The number of gallons of each cleanup material employed.
  - g. The VOC emissions from each coating employed, in pounds [(III.1.b.) X (III.1.e.)].
  - h. The VOC emissions from each cleanup material employed, in pounds [(III.1.d.) X (III.1.f.)].
  - i. The total VOC emissions from all the coatings and cleanup materials employed, in pounds [summation of (III.1.g.) for all coatings + summation of (III.1.h.) for cleanup materials].
  - j. The total number of days the emissions unit was in operation.
  - k. The average daily VOC emission rate for all the coatings and cleanup materials, i.e., [(III.1.i.)/(III.1.j.)], in pounds per day (average).
3. The permittee shall document whether or not the water wash and exhaust filter system were in service when the emissions unit was in operation.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) . The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 30 days following the end of the calendar month.
2. In accordance with Section A.1.c. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average daily VOC emission rate from the coatings and cleanup materials exceeded 126.6 pounds, and the actual average VOC emission rate for each such day.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Director (the RAPCA) in writing of any record showing that the water wash and the exhaust filter system were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 30 days after the event occurs.

### **V. Testing Requirements**

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

## V. Testing Requirements (continued)

- 1.a** Emission Limitation-  
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b** Emission Limitation-  
126.6 lbs/day VOC, including cleanup

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III. of this permit.

- 1.c** Emission Limitation-  
23.1 TPY VOC, including cleanup

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III. of this permit and shall be the sum of the monthly VOC emission rates for the calendar year, divided by 2000.

- 1.d** Emission Limitation: 0.551 lb PE/hr

Applicable Compliance Method: Compliance with the hourly PE limitation may be demonstrated by utilizing the following equation:

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

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed.

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation: Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

## 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:** Electrodeposition Paint System (K031)

**Activity Description:** Electrodeposition painting system

#### 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>
strut assembly electrodeposition system (600-gallon tank with bake oven)	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average (See A.1.2.a.)
	OAC rule 3745-31-05(A)(3) PTI 08-3315	1.35 tons VOC per month 16.2 TPY VOC
		2.9 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average (See A.1.2.b.)
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
		See A.1.2.c.

##### 2. Additional Terms and Conditions

- 2.a The VOC content of the coatings employed in the electrodeposition dip tank of this emissions unit shall comply with the VOC content limitation of 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents. To ensure compliance with this VOC content limitation, the combination of materials added to the dip tank (i.e., pigment, resin, and make-up solvent) shall meet 3.5 pounds of VOC per gallon of materials as a volume-weighted average, on a daily basis, excluding water and exempt solvents.
- 2.b The VOC content of the coatings employed in the electrodeposition dip tank of this emissions unit shall comply with the VOC content limitation of 2.90 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average. To ensure compliance with this VOC content limitation, the combination of materials added to the electrodeposition dip tank (i.e., pigment, resin, and make-up solvent) shall meet 2.90 pounds of VOC per gallon of materials as a volume-weighted average, on a monthly basis, excluding water and exempt solvents.

**2. Additional Terms and Conditions (continued)**

**2.c** The permittee shall not exceed the following material usage amounts and VOC contents for this emissions unit:

Material identification	VOC Content	Gallons/Month
Electrodeposition Paint	2.3* (1.0**)	524* (1,200**)
Make-up Solvent	7.51**	200**

\* excluding water and exempt solvents

\*\* including water and exempt solvents

**II. Operational Restrictions**

**None**

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

1. The permittee shall collect and record the following information each day for the electrodeposition dip tank:
  - a. The name and identification number of each material added to the electrodeposition dip tank.
  - b. The VOC content (in pounds per gallon, excluding water and exempt solvents) of each material added to the electrodeposition dip tank.
  - c. The number of gallons, excluding water and exempt solvents, of each material added to the electrodeposition dip tank.
  - d. The total amount of VOC material added to the electrodeposition dip tank, in pounds, i.e., the summation of (III.1.b.) x (III.1.c.) for all materials added.
  - e. The total number of gallons of all the materials added to the electrodeposition dip tank, excluding water and exempt solvents, i.e., the summation of III.1.c for all materials added.
  - f. The daily, volume-weighted average VOC content of the combination of materials (i.e., pigment, resin, and make-up solvent) added to the electrodeposition dip tank, in pounds per gallon, excluding water and exempt solvents, i.e., [III.1.d/III.1.e].

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

2. The permittee shall collect and record the following information each month for the electrodeposition dip tank:
  - a. The name (i.e., make-up solvent, pigment, resin) and identification number of each material added to the electrodeposition dip tank.
  - b. The VOC content (in pounds per gallon and in pounds/gallon, excluding water and exempt solvents) of each material added to the electrodeposition dip tank.
  - c. The number of gallons, including water and exempt solvents, and the number of gallons, excluding water and exempt solvents, of each material added to the electrodeposition dip tank.
  - d. The total amount of VOC material added to the electrodeposition dip tank, in pounds, i.e., the summation of (III.1.b.) x (III.1.c.) for all materials added.
  - e. The total number of gallons of all the materials added to the electrodeposition dip tank, excluding water and exempt solvents, and the number of gallons, including water and exempt solvents, i.e., the summation of III.1.c for all materials added.
  - f. The total number of gallons of all the make-up solvents added to the electrodeposition dip tank, i.e., the summation of III.1.c for all make-up solvents added, including water and exempt solvents.
  - g. The total number of gallons of all the materials added to the electrodeposition dip tank, excluding water and exempt solvents, minus the total number of gallons of all the make-up solvents added to the electrodeposition dip tank, excluding water and exempt solvents.
  - h. The monthly, volume-weighted average VOC content of the combination of materials (i.e., pigment, resin, and make-up solvent) added to the electrodeposition dip tank, in pounds per gallon, excluding water and exempt solvents, i.e., [III.1.d/III.1.e].

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

2. In accordance with paragraph A.1.c. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that include the following information for this emissions unit:
  - a. An identification of each month during which the monthly total VOC emission rate exceeded 1.35 tons, and the actual VOC emission rate for each such month.
  - b. An identification of each month during which the monthly material usage rates exceeded the 524-gallon coating and/or the 200-gallon solvent (excluding water and exempt solvents) usage limitations, and the actual monthly usages for each such month.
  - c. An identification of each month during which the monthly, volume-weighted average VOC content for the combined materials exceeded 2.9 lbs/gallon of coating, excluding water and exempt solvents, and the actual volume-weighted average VOC content for each such month.
  - d. An identification of each day during which the daily, volume-weighted average VOC content for the combined materials exceeded 3.5 lbs/gallon of coating, excluding water and exempt solvents, and the actual volume-weighted average VOC content for each such day.
  - e. An identification of each month during which the VOC content of each paint employed in this emissions unit exceeded the limitation of 2.3 lbs VOC/gallon, excluding water and exempt solvents (1.0 lbs VOC/gallon, including water and exempt solvents).
  - f. An identification of each month during which the VOC content of each make-up solvent employed in this emissions unit exceeded the limitation of 7.51 lbs VOC/gallon, including water and exempt solvents.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This report shall be submitted by January 31 of each year.

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

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation-  
3.5 lbs of VOC/gallon of coating materials, excluding water and exempt solvents, as a daily, volume-weighted average of all the materials added to the electrodeposition dip tank  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III of this permit.
  - 1.b Emission Limitation-  
1.35 tons/month VOC  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.2. of this permit.
  - 1.c Emission Limitation-  
16.2 TPY VOC  
  
Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

## V. Testing Requirements (continued)

- 1.d** Emission Limitation-  
2.9 lbs VOC/gallon of coating, as a monthly, volume-weighted average, excluding water and exempt solvents

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

- 1.e** Emission Limitation-  
2.3 lbs VOC/gallon of coating  
7.51 lbs VOC/gallon (for the make-up solvent)

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

- 1.f** Usage Limitations-  
524 gallons of coating (excluding water and exempt solvents)/month  
1,200 gallons of coating (including water and exempt solvents)/month  
200 gallons of make-up solvent/month

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

- 2.** USEPA Method 24 shall be used to determine the VOC contents of the coating materials (including solvents). If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating material and/or solvent, the permittee shall notify the Director (the RAPCA) and shall use formulation data for that coating material and/or solvent to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## 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:** #1 Shock Chrome Plater (P032)

**Activity Description:** Chrome plater

#### 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>
#1 shock chrome plater (hard chromium electroplating tank with composite mesh-pad system)	40 CFR Part 63 Subpart N 40 CFR 63.342(c)(1)(i)	The concentration of total chromium in the exhaust gases discharged to the atmosphere shall not exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) of ventilation air.
	40 CFR 63.342(f)	work practice standards (See Sections A.II.1, A.II.2., A.II.3., and A.II.4.)
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

None

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

## II. Operational Restrictions (continued)

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the RAPCA, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the RAPCA may require that the permittee make changes to the operation and maintenance plan if that plan:
  - a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipments as quickly as practicable.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (composite mesh-pad 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 for the composite mesh-pad system:
    - 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 the 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.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan in initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.

## II. Operational Restrictions (continued)

f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the RAPCA.

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the RAPCA for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the RAPCA for a period of five years after each such revision to the plan.

h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

5. The composite mesh-pad system shall be operated within the range of compliant values for pressure drop (2.0 to 5.4 inches of water) established during performance tests completed on August 27, 1996 and July 24, 1997.

## III. Monitoring and/or Record Keeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance:
- During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.
  - The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.
  - On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating.

Note: The initial performance testing was completed on August 27, 1996 and July 24, 1997; and it established the acceptable pressure drop range from 2.0 to 5.4 inches of water.

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

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

3. The permittee also shall maintain the following records:
- a. Inspection records for the add-on air pollution control device, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
  - b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and Sections 63.9 and 63.10 of 40 CFR Part 63, subpart A.

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

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

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 the 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 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 fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the RAPCA and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the RAPCA on or before the specified date.
2. The permittee shall submit an ongoing compliance status report semiannually (except when more frequent reporting is required under Section A.IV.3.) to the RAPCA to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. The company name and address of the emissions unit.
  - b. An identification of the operating parameter that is monitored for compliance determination.
  - c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.

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

- 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.
- 3.** The permittee shall submit the ongoing compliance status reports semiannually except when:
- a. The the RAPCA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
  - b. The monitoring data collected by the permittee in accordance with Section A.III.1. show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved under Section A.IV.4.
- 4.** The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if all of the following conditions are met:
- a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63 subpart A and others listed in the permit.
  - c. The RAPCA does not object to a reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies the RAPCA in writing of its intention to make such a change, and the RAPCA does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the RAPCA may review information concerning the facility's entire previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is disapproved, the permittee will be notified in writing within 45 days after receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval 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.
- 5.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate visible particulate emissions. These reports shall be submitted to the RAPCA by January 31 and July 31 of each year and shall cover the previous 6 month period.

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

- 1.** Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

## **V. Testing Requirements (continued)**

- 1.a** Emission Limitation-  
0.015 mg/dscm (6.6 E-06 gr/dscf) total chromium in exhaust gases

Applicable Compliance Method-

Performance tests were completed on August 27, 1996 and July 24, 1997 with results showing average chromium emission rates of 9.31 E-07 gr/dscf and 5.189 E-07 gr/dscf, respectively.

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.

- 1.b** Emission Limitation-  
0.551 lb/hour PE

Applicable Compliance Method-

Compliance shall be determined by multiplying  $8.0 \times 10^{-6}$  gr/dscf times 100 dscf/A-hr (AP-42 emission factor from Table 12.20-1 for hard chromium electroplating) by the maximum current of the plating bath (36,000 A). This grains per hour emission rate is then divided by 7,000 grains per pound to obtain the mass particulate emissions.

If required, compliance with this mass emission limitation shall be based upon stack testing in accordance with OAC rule 3745-17-03(B)(10).

- 1.c** Emission Limitation -  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Compliance Method -

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

## **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:** #1 Strut Chrome Plater (P041)

**Activity Description:** Chrome plater

#### 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>
#1 strut chrome plater (hard chromium electroplating tank with composite mesh-pad system)	40 CFR Part 63 Subpart N 40 CFR 63.342(c)(1)(i)	The concentration of total chromium in the exhaust gases discharged to the atmosphere shall not exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) of ventilation air.
	40 CFR 63.342(f)	work practice standards (See Sections A.II.1, A.II.2., A.II.3., and A.II.4.)
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

None

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

## II. Operational Restrictions (continued)

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the RAPCA, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the RAPCA may require that the permittee make changes to the operation and maintenance plan if that plan:
  - a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipments as quickly as practicable.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (composite mesh-pad 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 for the composite mesh-pad system:
    - 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 the 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.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan in initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.

## II. Operational Restrictions (continued)

f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the RAPCA.

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the RAPCA for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the RAPCA for a period of five years after each such revision to the plan.

h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

5. The composite mesh-pad system shall be operated within the range of compliant values for pressure drop (2.0 to 5.4 inches of water) established during performance tests completed on August 27, 1996 and July 24, 1997.

## III. Monitoring and/or Record Keeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance:
- a. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.
  - b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.
  - c. On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating.

Note: The initial performance testing was completed on August 27, 1996 and July 24, 1997; and it established the acceptable pressure drop range from 2.0 to 5.4 inches of water.

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

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

3. The permittee also shall maintain the following records:
- a. Inspection records for the add-on air pollution control device, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
  - b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and Sections 63.9 and 63.10 of 40 CFR Part 63, subpart A.

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

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

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 the 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 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 fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the RAPCA and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the RAPCA on or before the specified date.
2. The permittee shall submit an ongoing compliance status report semiannually (except when more frequent reporting is required under Section A.IV.3.) to the RAPCA to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. The company name and address of the emissions unit.
  - b. An identification of the operating parameter that is monitored for compliance determination.
  - c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.

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

- 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.
- 3.** The permittee shall submit the ongoing compliance status reports semiannually except when:
- a. The the RAPCA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
  - b. The monitoring data collected by the permittee in accordance with Section A.III.1. show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved under Section A.IV.4.
- 4.** The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if all of the following conditions are met:
- a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63 subpart A and others listed in the permit.
  - c. The RAPCA does not object to a reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies the RAPCA in writing of its intention to make such a change, and the RAPCA does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the RAPCA may review information concerning the facility's entire previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is disapproved, the permittee will be notified in writing within 45 days after receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval 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.
- 5.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate visible particulate emissions. These reports shall be submitted to the RAPCA by January 31 and July 31 of each year and shall cover the previous 6 month period.

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

- 1.** Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

## **V. Testing Requirements (continued)**

- 1.a** Emission Limitation-  
0.015 mg/dscm (6.6 E-06 gr/dscf) total chromium in exhaust gases

Applicable Compliance Method-

Performance tests were completed on August 27, 1996 and July 24, 1997 with results showing average chromium emission rates of 9.31 E-07 gr/dscf and 5.189 E-07 gr/dscf, respectively.

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.

- 1.b** Emission Limitation-  
0.551 lb/hour PE

Applicable Compliance Method-

Compliance shall be determined by multiplying 8.0 X 10<sup>-6</sup> gr/dscf times 100 dscf/A-hr (AP-42 emission factor from Table 12.20-1 for hard chromium electroplating) by the maximum current of the plating bath (36,000 A). This grains per hour emission rate is then divided by 7,000 grains per pound to obtain the mass particulate emissions.

If required, compliance with this mass emission limitation shall be based upon stack testing in accordance with OAC rule 3745-17-03(B)(10).

- 1.c** Emission Limitation -  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Compliance Method -

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

## **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:** #2 Strut Chrome Plater (P056)

**Activity Description:** Chrome plater

#### 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>
#2 strut chrome plater (hard chromium electroplating tank with composite mesh-pad system)	40 CFR Part 63 Subpart N 40 CFR 63.342(c)(1)(i)	The concentration of total chromium in the exhaust gases discharged to the atmosphere shall not exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) of ventilation air.
	40 CFR 63.342(f)	work practice standards (See Sections A.II.1, A.II.2., A.II.3., and A.II.4.)
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

None

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

## II. Operational Restrictions (continued)

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the RAPCA, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the RAPCA may require that the permittee make changes to the operation and maintenance plan if that plan:
  - a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipments as quickly as practicable.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (composite mesh-pad 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 for the composite mesh-pad system:
    - 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 the 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.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan in initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.

## II. Operational Restrictions (continued)

f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the RAPCA.

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the RAPCA for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the RAPCA for a period of five years after each such revision to the plan.

h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

5. The composite mesh-pad system shall be operated within the range of compliant values for pressure drop (2.0 to 5.4 inches of water) established during performance tests completed on August 27, 1996 and July 24, 1997.

## III. Monitoring and/or Record Keeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance:
- During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.
  - The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.
  - On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating.

Note: The initial performance testing was completed on August 27, 1996 and July 24, 1997; and it established the acceptable pressure drop range from 2.0 to 5.4 inches of water.

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

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

3. The permittee also shall maintain the following records:
- a. Inspection records for the add-on air pollution control device, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
  - b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and Sections 63.9 and 63.10 of 40 CFR Part 63, subpart A.

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

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

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 the 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 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 fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the RAPCA and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the RAPCA on or before the specified date.
2. The permittee shall submit an ongoing compliance status report semiannually (except when more frequent reporting is required under Section A.IV.3.) to the RAPCA to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. The company name and address of the emissions unit.
  - b. An identification of the operating parameter that is monitored for compliance determination.
  - c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.

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

- 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.
- 3.** The permittee shall submit the ongoing compliance status reports semiannually except when:
- a. The the RAPCA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
  - b. The monitoring data collected by the permittee in accordance with Section A.III.1. show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved under Section A.IV.4.
- 4.** The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if all of the following conditions are met:
- a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63 subpart A and others listed in the permit.
  - c. The RAPCA does not object to a reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies the RAPCA in writing of its intention to make such a change, and the RAPCA does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the RAPCA may review information concerning the facility's entire previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is disapproved, the permittee will be notified in writing within 45 days after receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval 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.
- 5.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate visible particulate emissions. These reports shall be submitted to the RAPCA by January 31 and July 31 of each year and shall cover the previous 6 month period.

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

- 1.** Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

## **V. Testing Requirements (continued)**

- 1.a** Emission Limitation-  
0.015 mg/dscm (6.6 E-06 gr/dscf) total chromium in exhaust gases

Applicable Compliance Method-

Performance tests were completed on August 27, 1996 and July 24, 1997 with results showing average chromium emission rates of 9.31 E-07 gr/dscf and 5.189 E-07 gr/dscf, respectively.

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.

- 1.b** Emission Limitation-  
0.551 lb/hour PE

Applicable Compliance Method-

Compliance shall be determined by multiplying  $8.0 \times 10^{-6}$  gr/dscf times 100 dscf/A-hr (AP-42 emission factor from Table 12.20-1 for hard chromium electroplating) by the maximum current of the plating bath (36,000 A). This grains per hour emission rate is then divided by 7,000 grains per pound to obtain the mass particulate emissions.

If required, compliance with this mass emission limitation shall be based upon stack testing in accordance with OAC rule 3745-17-03(B)(10).

- 1.c** Emission Limitation -  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Compliance Method -

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

## **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:** #3 Strut Chrome Plater (P058)

**Activity Description:** Chrome plater

#### 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>
#3 strut chrome plater (hard chromium electroplating tank with composite mesh-pad system)	40 CFR Part 63 Subpart N 40 CFR 63.342(c)(1)(i)	The concentration of total chromium in the exhaust gases discharged to the atmosphere shall not exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) of ventilation air.
	40 CFR 63.342(f)	work practice standards (See Sections A.II.1, A.II.2., A.II.3., and A.II.4.)
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

None

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

## II. Operational Restrictions (continued)

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the RAPCA, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the RAPCA may require that the permittee make changes to the operation and maintenance plan if that plan:
  - a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipments as quickly as practicable.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (composite mesh-pad 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 for the composite mesh-pad system:
    - 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 the 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.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan in initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.

## II. Operational Restrictions (continued)

f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the RAPCA.

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the RAPCA for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the RAPCA for a period of five years after each such revision to the plan.

h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

5. The composite mesh-pad system shall be operated within the range of compliant values for pressure drop (2.0 to 5.4 inches of water) established during performance tests completed on August 27, 1996 and July 24, 1997.

## III. Monitoring and/or Record Keeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance:
- a. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.
  - b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.
  - c. On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating.

Note: The initial performance testing was completed on August 27, 1996 and July 24, 1997; and it established the acceptable pressure drop range from 2.0 to 5.4 inches of water.

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

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

3. The permittee also shall maintain the following records:
- a. Inspection records for the add-on air pollution control device, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
  - b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and Sections 63.9 and 63.10 of 40 CFR Part 63, subpart A.

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

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

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 the 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 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 fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the RAPCA and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the RAPCA on or before the specified date.
2. The permittee shall submit an ongoing compliance status report semiannually (except when more frequent reporting is required under Section A.IV.3.) to the RAPCA to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. The company name and address of the emissions unit.
  - b. An identification of the operating parameter that is monitored for compliance determination.
  - c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.

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

- 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.
- 3.** The permittee shall submit the ongoing compliance status reports semiannually except when:
- a. The the RAPCA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
  - b. The monitoring data collected by the permittee in accordance with Section A.III.1. show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved under Section A.IV.4.
- 4.** The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if all of the following conditions are met:
- a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63 subpart A and others listed in the permit.
  - c. The RAPCA does not object to a reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies the RAPCA in writing of its intention to make such a change, and the RAPCA does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the RAPCA may review information concerning the facility's entire previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is disapproved, the permittee will be notified in writing within 45 days after receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval 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.
- 5.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate visible particulate emissions. These reports shall be submitted to the RAPCA by January 31 and July 31 of each year and shall cover the previous 6 month period.

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

- 1.** Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

## **V. Testing Requirements (continued)**

- 1.a** Emission Limitation-  
0.015 mg/dscm (6.6 E-06 gr/dscf) total chromium in exhaust gases

Applicable Compliance Method-

Performance tests were completed on August 27, 1996 and July 24, 1997 with results showing average chromium emission rates of 9.31 E-07 gr/dscf and 5.189 E-07 gr/dscf, respectively.

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.

- 1.b** Emission Limitation-  
0.551 lb/hour PE

Applicable Compliance Method-

Compliance shall be determined by multiplying  $8.0 \times 10^{-6}$  gr/dscf times 100 dscf/A-hr (AP-42 emission factor from Table 12.20-1 for hard chromium electroplating) by the maximum current of the plating bath (36,000 A). This grains per hour emission rate is then divided by 7,000 grains per pound to obtain the mass particulate emissions.

If required, compliance with this mass emission limitation shall be based upon stack testing in accordance with OAC rule 3745-17-03(B)(10).

- 1.c** Emission Limitation -  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Compliance Method -

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

## **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:** #4 Strut Chrome Plater (P079)

**Activity Description:** Chrome plater

#### 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>
#4 strut chrome plater (hard chromium electroplating tank with composite mesh-pad system)	40 CFR Part 63 Subpart N 40 CFR 63.342(c)(1)(i)	The concentration of total chromium in the exhaust gases discharged to the atmosphere shall not exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) of ventilation air.
	40 CFR 63.342(f)	work practice standards (see Sections A.II.1., A.II.2., A.II.3., and A.II.4.)
	OAC rule 3745-31-05(A)(3) PTI 08-1796	15 lbs/yr chromium
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 subpart N and OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

- 2.a The 15 lbs/yr chromium limit was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

##### 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. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the RAPCA, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the RAPCA may require that the permittee make changes to the operation and maintenance plan if that plan:
  - a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipments as quickly as practicable.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (composite mesh-pad 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 for the composite mesh-pad system:
    - 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 the 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.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan in initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.

## II. Operational Restrictions (continued)

f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the RAPCA.

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the RAPCA for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the RAPCA for a period of five years after each such revision to the plan.

h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

5. The composite mesh-pad system shall be operated within the range of compliant values for pressure drop (4.0 to 9.4 inches of water) established during performance tests conducted on August 30, 1996 and May 1, 1997.

## III. Monitoring and/or Record Keeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance:
  - a. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.
  - b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.
  - c. On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating.

Note: The initial performance testing was conducted on August 30, 1996 and May 1, 1997; and it established the acceptable pressure drop range between 4.0 to 9.4 inches of water.

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

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

3. The permittee also shall maintain the following records:
- a. Inspection records for the add-on air pollution control device, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
  - b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and Sections 63.9 and 63.10 of 40 CFR Part 63, subpart A.

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

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

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 the 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 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 fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the RAPCA and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the RAPCA on or before the specified date.
2. The permittee shall submit an ongoing compliance status report semiannually (except when more frequent reporting is required under Section A.IV.3.) to the RAPCA to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. The company name and address of the emissions unit.
  - b. An identification of the operating parameter that is monitored for compliance determination.
  - c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.

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

- 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.
- 3.** The permittee shall submit the ongoing compliance status reports semiannually except when:
- a. The RAPCA determines on a case-by-case basis that a more frequent reporting is necessary to accurately assess the compliance status of the source; or
  - b. The monitoring data collected by the permittee in accordance with Section A.III.1. show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved under Section A.IV.4.
- 4.** The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if all of the following conditions are met:
- a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR, Part 63 subpart A and others listed in the permit.
  - c. The RAPCA does not object to a reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies the RAPCA in writing of its intention to make such a change, and the RAPCA does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the RAPCA 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 receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval 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.
- 5.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate visible particulate emissions. These reports shall be submitted to the RAPCA by January 31 and July 31 of each year and shall cover the previous 6 month period.

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

- 1.** Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

## V. Testing Requirements (continued)

- 1.a** Emission Limitation-  
0.015 mg/dscm (6.6 E-06 gr/dscf) total chromium in exhaust gases

Applicable Compliance Method-

Performance tests were conducted on August 30, 1996 and May 1, 1997 with results showing average chromium emission rates of 8.26 E-07 gr/dscf and 8.68 E-07 gr/dscf, respectively.

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.

- 1.b** Emission Limitation-  
15 lbs/yr chrome

Applicable Compliance Method-

Compliance shall be determined by multiplying the average pounds per hour emission rate from the most recent compliance test by the maximum annual operating hours of 8,760. Until additional test are conducted, the average hourly emission rate of 0.00017 pounds shall be used in this calculation, as determined during the stack test conducted on May 1, 1997.

- 1.c** Emission Limitation-  
0.551 lb/hour PE

Applicable Compliance Method-

Compliance shall be determined by multiplying  $8.0 \times 10^{-6}$  gr/dscf times 100 dscf/A-hr (AP-42 emission factor from Table 12.20-1 for hard chromium electroplating) by the maximum current of the plating bath (60,000 A). This grains per hour emission rate is then divided by 7,000 grains per pound to obtain the mass particulate emissions.

If required, compliance with this mass emission limitation shall be based upon stack testing in accordance with OAC rule 3745-17-03(B)(10).

- 1.d** Emission Limitation -  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Compliance Method -

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

## 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:** #2 Shock Chrome Plater (P092)

**Activity Description:** Chrome plater

#### 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>
#2 shock chrome plater (hard chromium electroplating tank with composite mesh-pad system)	40 CFR Part 63 Subpart N 40 CFR 63.342(c)(1)(i)	The concentration of total chromium (Cr) in the exhaust gases discharged to the atmosphere shall not exceed 0.015 mg/dscm (6.6 E-06 gr/dscf) of ventilation air.
	40 CFR 63.342(f)	work practice standards (see Sections A.II.1, A.II.2., A.II.3., and A.II.4.)
	OAC rule 3745-31-05(A)(3) PTI 08-2214	2.6E-3 lb/hr and 0.0114 TPY Cr  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart N and OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)(1)  OAC rule 3745-17-07(A)	0.551 lb/hour particulate emissions (PE)  Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

None

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

## II. Operational Restrictions (continued)

3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the RAPCA, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the RAPCA may require that the permittee make changes to the operation and maintenance plan if that plan:
  - a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipments as quickly as practicable.
4. The permittee shall implement an operation and maintenance plan that includes the following elements:
  - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (composite mesh-pad 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 for the composite mesh-pad system:
    - 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 the 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.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan in initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.

## II. Operational Restrictions (continued)

f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the RAPCA.

g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the RAPCA for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the RAPCA for a period of five years after each such revision to the plan.

h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

5. The composite mesh-pad system shall be operated within the range of compliant values for pressure drop (2.0 to 10.3 inches of water) established during performance tests completed on August 27, 1996 and June 3, 1997.

## III. Monitoring and/or Record Keeping Requirements

1. Composite mesh-pad (CMP) system monitoring requirements to demonstrate continuous compliance:
- a. During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitations through the use of a composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.
  - b. The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.
  - c. On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emission unit is operating.

Note: The initial performance testing was completed on August 27, 1996 and June 3, 1997; and it established the acceptable pressure drop range between 2.0 to 10.3 inches of water.

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

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

3. The permittee also shall maintain the following records:
- a. Inspection records for the add-on air pollution control device, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
  - b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.
  - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.
  - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
  - f. Test reports documenting results of all performance tests.
  - g. All measurements as may be necessary to determine the conditions of performance tests.
  - h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment.
  - k. The total process operating time of the emissions unit during the reporting period.
  - l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and Sections 63.9 and 63.10 of 40 CFR Part 63, subpart A.

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

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

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 the 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 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 fulfill all reporting requirements as outlined in 40 CFR Part 63 subpart A. These reports shall be made to the RAPCA and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the RAPCA on or before the specified date.
2. The permittee shall submit an ongoing compliance status report semiannually (except when more frequent reporting is required under Section A.IV.3.) to the RAPCA to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. The company name and address of the emissions unit.
  - b. An identification of the operating parameter that is monitored for compliance determination.
  - c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.
  - d. The beginning and ending dates of the reporting period.
  - e. The total operating time of the emissions unit during the reporting period.
  - f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
  - g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.
  - h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.

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

- 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.
3. The permittee shall submit the ongoing compliance status report semiannually except when:
- a. The RAPCA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
  - b. The monitoring data collected by the permittee in accordance with Section A.III.1. show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved under Section A.IV.4.
4. The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if all of the following conditions are met:
- a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR, Part 63 subpart A and others listed in the permit.
  - c. The RAPCA does not object to a reduced reporting for the affected emissions unit and if the following requirements are met:
    - i. The permittee notifies the RAPCA in writing of its intention to make such a change, and the RAPCA does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the RAPCA 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 receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval 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.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate visible particulate emissions. These reports shall be submitted to the RAPCA by January 31 and July 31 of each year and shall cover the previous 6 month period.

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

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

## V. Testing Requirements (continued)

- 1.a** Emission Limitation-  
0.015 mg/dscm (6.6 E-06 gr/dscf) total Cr in exhaust gases

Applicable Compliance Method-

Performance tests were completed on August 27, 1996 and June 3, 1997 with results showing average chromium emission rates of 1.95 E-06 gr/dscf and 7.38 E-07 gr/dscf, respectively.

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.

- 1.b** Emission Limitation-  
2.6E-3 lb/hr Cr

Applicable Compliance Method-

Compliance with this allowable emission rate was demonstrated in performance tests conducted on August 14 and 27, 1996 and June 3, 1997 with results showing an average total chromium emission rate of 5.7E-4 lb/hr and 1.4E-4 lb/hr, respectively.

If required, additional performance testing shall be conducted in accordance with the methods and procedures specified in 40 CFR Part 63 Subpart N.

- 1.c** Emission Limitation-  
0.0114 TPY Cr

Applicable Compliance Method-

The 0.0114 ton/yr emission limitation was developed by multiplying the 0.0026 lb/hr emission limitation by a maximum annual operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the 0.0026 lb/hr Cr limitation, compliance shall also be shown with the annual limitation.

- 1.d** Emission Limitation-  
0.551 lb/hour PE

Applicable Compliance Method-

Compliance shall be determined by multiplying 8.0 X 10<sup>-6</sup> gr/dscf times 100 dscf/A-hr (AP-42 emission factor from Table 12.20-1 for hard chromium electroplating) by the maximum current of the plating bath (42,000 A). This grains per hour emission rate is then divided by 7,000 grains per pound to obtain the mass particulate emissions.

If required, compliance with this mass emission limitation shall be based upon stack testing in accordance with OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation -  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Compliance Method -

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

## 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:** #11 Anneal Furnace (P094)

**Activity Description:** Annealing furnace

#### 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>
annealing furnace #11	OAC rule 3745-17-11(A)	none (See Section A.1.2.a.)
	OAC rule 3745-17-07	none (See Section A.1.2.b.)
	OAC rule 3745-18-06(E)	None, exempt pursuant to OAC rule 3745-18-06(C) (See A.1.2.c.)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of emission (UMRE) for particulate emissions (PE) from this emissions unit is less than 10 pounds per hour because the metal parts charged do not emit particulates and the only source of PE from the annealing furnace is from the combustion of natural gas, and natural gas is the only fuel burned in this emissions unit. Therefore, pursuant to OAC rules 3745-17-11(A)(2)(a)(ii) and 17-11(A)(4), Figure II and Table I, respectively, do not apply to this emissions unit.
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c There is no sulfur dioxide emission limitation established by OAC Chapter 3745-18 for this emissions unit because the process weight rate is less than 1,000 pounds/hour.

##### II. Operational Restrictions

None

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

None

##### IV. Reporting Requirements

None

##### V. Testing Requirements

None

Facility Name: **Delphi Chassis Systems, Kettering Operations**  
Facility ID: **08-57-08-0148**  
Emissions Unit: **#11 Anneal Furnace (P094)**

## **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:** Storage Tank System- 50,000 Gals (T013)

**Activity Description:** Storage tank

#### 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>
two, 25,000-gallon petroleum oil storage tanks #23 and #24	NSPS Subpart Kb, 40 CFR 60.110b(c)	none (See A.III.3 and 4.)
	OAC rule 3745-21-09(L)	exempt (See A.I.2.a. below.)
	OAC rule 3745-31-05(A)(3) PTI 08-2296	1.16 TPY organic compounds (OC)
		See Sections A.II.1.

##### 2. Additional Terms and Conditions

- 2.a In accordance with OAC rule 3745-21-09(L)(2), each storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

##### II. Operational Restrictions

1. Each tank shall be loaded by means of a submerged fill pipe, defined as any fill pipe with the discharge opening entirely submerged when the liquid level is six inches above the bottom of the tank or when loaded from the side, any fill pipe with the discharge opening entirely submerged when the liquid level is eighteen inches above the bottom of the tank.

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

1. The permittee shall perform annual inspections of the white paint finish of each storage tank and make repairs, when necessary, to maintain the white tank finish in good condition.
2. The permittee shall maintain monthly records of the petroleum oil throughput, in gallons.
3. The permittee shall record and maintain the following information for this emissions unit on a quarterly basis:
  - a. The identification of the material being stored.
  - b. The true vapor pressure of the material being stored, in psia.
  - c. Whether or not each tank is equipped with a submerged fill pipe.
4. The permittee shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of the source.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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

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

Emission Limitation:  
1.16 TPY OC

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in section A.III and the standing storage and working loss emission formulas provided in AP-42 Chapter 7, Organic Liquid Storage Tanks, Section 7.1.3.1, Total Losses from Fixed Roof Tanks (revised 9/1997) or the "TANKS 3.1" software program.

#### **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:** Storage Tank System- 90,000 Gals (T015)  
**Activity Description:** Storage tank

#### 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>
three 30,000-gallon petroleum oil storage tanks #25, #26, #27	NSPS Subpart Kb, 40 CFR 60.110b(c)	none (See A.III.3 and 4.)
	OAC rule 3745-21-09(L)	exempt (See A.I.2.a. below.)
	OAC rule 3745-31-05(A)(3)	< 0.01 TPY organic compounds (OC)
	PTI 08-2528	See Sections A.II.1.

##### 2. Additional Terms and Conditions

- 2.a In accordance with OAC rule 3745-21-09(L)(2), each storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

##### II. Operational Restrictions

1. Each tank shall be loaded by means of a submerged fill pipe, defined as any fill pipe with the discharge opening entirely submerged when the liquid level is six inches above the bottom of the tank or when loaded from the side, any fill pipe with the discharge opening entirely submerged when the liquid level is eighteen inches above the bottom of the tank.

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

1. The permittee shall perform annual inspections of the white paint finish of each storage tank and make repairs, when necessary, to maintain the white tank finish in good condition.
2. The permittee shall maintain monthly records of the petroleum oil throughput, in gallons.
3. The permittee shall record and maintain the following information for this emissions unit on a quarterly basis:
  - a. The identification of the material being stored.
  - b. The true vapor pressure of the material being stored, in psia.
  - c. Whether or not each tank is equipped with a submerged fill pipe.
4. The permittee shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of the source.

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

1. The permittee shall submit annual reports that summarize the actual annual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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

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

Emission Limitation:  
<0.01 TPY OC

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in section A.III and the standing storage and working loss emission formulas provided in AP-42 Chapter 7, Organic Liquid Storage Tanks, Section 7.1.3.1, Total Losses from Fixed Roof Tanks (revised 9/1997) or the "TANKS 3.1" software program.

#### **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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