



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Montgomery County ✓
Application No: 08-3589
NESHAP

CERTIFIED MAIL

March 19, 1997

RECEIVED

MAR 21 1997

DAYTON WHEEL PRODUCTS
MARK ABERNATHY
1147 SOUTH BROADWAY STREET
DAYTON, OH 45408

REGIONAL AIR POLLUTION
CONTROL AGENCY

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
REGIONAL AIR POLLUTION CONTROL

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 08-3589
APS Premise No. 0857023103
Permit Fee: \$200.00

Name of Facility: DAYTON WHEEL PRODUCTS

Person to Contact: MARK ABERNATHY

Address: 1147 SOUTH BROADWAY STREET
DAYTON, OH 45408

Location of proposed source(s): 115 COMPARK DRIVE
CENTERVILLE, OHIO

Description of proposed source(s):
AUTOMOBILE WHEEL PARTS PLATING ROOM.

Date of Issuance: March 19, 1997

Effective Date: March 19, 1997

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

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may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for DAYTON WHEEL PRODUCTS located in Montgomery County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P001	Plating room, nickel chrome plater nickel gold plater pre-treatment line	*	3745-31-05 3745-17-07 3745-17-11 3745-15-07 40 CFR Part 9 and 63 Subpart N	Chrome - 0.01 mg/dscm; or if a fume suppressant containing a wetting agent is used; the surface tension of the electroplating or anodizing bath contained within the affected source shall not exceed 45 dynes/cm; Nickel 3.6 E-5 lb/hr

* BAT is compliance with the MACT standard, applicable OAC rules and specified emission rates; recordkeeping, reporting.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Chromium	1.6 E-3
Nickel	1.6 E-4

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test.

The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

Source

Pollutants

P001

Chromium

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering

practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

FEDERAL MACT REQUIREMENTS

1. APPLICABILITY

In accordance with 40 CFR 63.340, this facility is subject to all applicable requirements of 40 CFR Part 63 Subpart N **National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.**

2. COMPLIANCE DATES

In accordance with 40 CFR 63.343(a)(2), this facility shall comply with all applicable requirements of 40 CFR Part 63 Subpart N immediately upon startup.

3. EMISSION STANDARD

In accordance with 40 CFR 63.342(d), the concentration of total chromium in the exhaust gas discharged to the atmosphere shall not exceed 0.01 mg/dscm; or if a chemical fume suppressant containing a wetting agent is used, the surface tension of the electroplating or anodizing bath contained within the affected source shall not exceed 45 dynes per centimeter.

4. WORK PRACTICE REQUIREMENTS

In accordance with 40 CFR 63.342(f)(3)(I), this facility shall prepare and implement an Operation and Maintenance Plan (O&MP) for each affected source by the compliance date(s) specified above. If applicable, the O&MP shall be incorporated into the Title V permit.

The O&MP shall include elements as required in the following sections of 40 CFR Part 63 Subpart N:

- 40 CFR 63.342(f)(3)(I)(A)
- 40 CFR 63.342(f)(3)(I)(B)
- 40 CFR 63.342 Table 1
- 40 CFR 63.342(f)(3)(I)(C)
- 40 CFR 63.342(f)(3)(I)(D)
- 40 CFR 63.342(f)(3)(I)(E)

In accordance with 40 CFR 63.342(f)(1)(I), this facility shall operate and maintain each affected source, including associated air pollution control devices and monitoring equipment, at all times, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practices and consistent with the O&MP.

In accordance with 40 CFR 63.342(f)(1)(ii), malfunctions shall be corrected as soon as practicable in accordance with the O&MP.

In accordance with 40 CFR 63.342(f)(3)(ii), the O&MP shall be revised within 45 days of the occurrence of a malfunction if it fails to adequately address the malfunction event.

In accordance with 40 CFR 63.342(f)(3)(iv), this facility shall report to the Regional Air Pollution Control Agency any actions inconsistent with the O&MP taken by the facility during periods of malfunction within 2 working days of the action. This report shall be followed by a letter within 7 working days after the end of the malfunction event.

In accordance with 40 CFR 63.342(f)(3)(iii), recordkeeping associated with the O&MP is specified in 40 CFR 63.346(b). Reporting associated with the O&MP is specified in 40 CFR 63.347(g) and (h).

In accordance with 40 CFR 63.342(f)(3)(v), this facility shall keep the O&MP on record to be available for inspection for the life of the affected source. If the O&MP is revised, the superseded versions shall be retained for inspection for 5 years after each revision to the O&MP.

In accordance with 40 CFR 63.342(g), the requirements of 40 CFR Part 63 Subpart N for chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.

5. METHODS TO DEMONSTRATE INITIAL COMPLIANCE

In accordance with 40 CFR 63.343(b), this facility is required to conduct an initial performance test using the procedures and test methods listed in 40 CFR 63.7 and 40 CFR 63.344.

6. MONITORING TO DEMONSTRATE CONTINUOUS COMPLIANCE

In accordance with 40 CFR 63.343(c), this facility shall demonstrate continuous compliance with the emission limits specified in this permit by conducting monitoring as referenced below:

This facility shall comply with the requirements of 40 CFR 63.343(c)(5).

7. NOTIFICATION OF CONSTRUCTION OR RECONSTRUCTION

In accordance with 40 CFR 63.345(b), this facility shall submit a notification of construction or reconstruction to the Administrator and Regional Air Pollution Control Agency as soon as practicable before the construction or reconstruction is planned to commence.

8. RECORDKEEPING REQUIREMENTS

In accordance with 40 CFR 63.346, this facility shall fulfill all applicable record keeping requirements listed in Table 1 to Subpart N of Part 63 as well as maintain all applicable records listed in 40 CFR 63.346(b). All records shall be maintained for a period of 5 years.

9. REPORTING REQUIREMENTS

In accordance with 40 CFR 63.347, this facility shall fulfill all applicable reporting requirements listed in Table 1 to Subpart N of Part 63 as well as fulfill all applicable reporting requirements listed below:

Initial notifications - 40 CFR 63.347(c)
Notification of performance test - 40 CFR 63.347(d)
Notification of compliance status - 40 CFR 63.347(e)
Report of performance test results - 40 CFR 63.347(f)
Ongoing compliance reports/major sources - 40 CFR 63.347(g)

Ongoing compliance reports/area sources - 40 CFR 63.347(h)
Trivalent chromium bath reports - 40 CFR 63.347(I)

All reports shall be submitted to the Administrator and the *Regional Air Pollution Control Agency* at the addresses listed below:

George Czerniak
Chief of Air Enforcement Branch
Region V, USEPA
AE-17J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Carlos Lynch
RAPCA
451 West Third Street
Dayton, OH 45422

10. NICKEL/PACKED BED SCRUBBER OPERATIONAL LIMITATIONS

The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 218 gallons per minute at all times while the emissions unit is in operation.

11. NICKEL/PACKED BED SCRUBBER MONITORING AND RECORDKEEPING REQUIREMENTS

The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- A. the pressure drop across the scrubber, in inches of water, on a once/shift basis;
- B. the scrubber water flow rate, in gallons per minute, on a once/shift basis; and
- C. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

12. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

- A. the static pressure drop across the scrubber; and

B. the scrubber water flow rate.

13. NICKEL/PACKED SCRUBBER PH OPERATIONAL RESTRICTIONS

The pH of the scrubber liquor shall be maintained within the range of (7-10).

14. NICKEL/PACKED SCRUBBER PH MONITORING AND RECORDKEEPING REQUIREMENTS

The permittee shall periodically monitor and record the pH of the scrubber liquor while the emissions unit is in operation.

The permittee shall collect and record the following information each day:

A. the pH of the scrubber liquor, on a once/shift basis.

15. NICKEL/PACKED SCRUBBER PH REPORTING REQUIREMENTS

The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.