OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Summit County
Application No: 16-1611
NESHAP

CERTIFIED MAIL

March 26, 1997

TRI-COUNTY HARD CHROME, INC.
DENNIS G. PARSLOW
P.O. BOX 425
TALLMADGE, OH 44278

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
AKRON AIR POLLUTION CONTROL

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

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OhioEPA

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 16-1611
APS Premise No. 1677010072
Permit Fee: $200.00

Name of Facility: TRI-COUNTY HARD CHROME, INC.

Person to Contact: DENNIS G. PARSLOW

Address: P.O. BOX 425
TALLMADGE, OH 44278

Location of proposed source(s): 181 POTOMAC AVE.
TALLMADGE, OHIO

Description of proposed source(s):
THREE HARD CHROME ELECTROPLATING TANKS WITH A MIST ELIMINATO
R.

Date of Issuance: March 26, 1997

Effective Date: March 26, 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

REC'D. ARAQMD

Donald R Schreyardus

1 MAR 97 1:15

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)

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 TRI-COUNTY HARD CHROME, INC. located in Summit 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P002	Hard chrome plating tanks	Compliance with state and federal regulations and the use of a control, i.e. mist eliminator	3745-31-05 40 CFR 63 Subpart N 3745-17-11 3745-15-03 3745-15-06 3745-15-07	0.10 lb/hr Particulate Matter 0.03 mg/dscm total Chromium Compounds

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Particulate Matter	0.438
Chromium Compounds	0.025

NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

Source No.	Source Description	NESHAP Regulation
P002	Hard chrome electroplating line	40 CFR 63 - Subpart N

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

a. date of commencement of construction (no later than 30 days after such date);
b. anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
c. actual date of initial start-up (within 15 days after such date); and
d. date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Division of Air Pollution Control
Permit Management Unit
P.O. Box 1049
Columbus, OH 43216-1049

and Akron Air Pollution Control
177 South Broadway
Akron, Ohio 44308

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 Akron Air Pollution Control, 177 South Broadway, Akron, Ohio 44308.

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 Akron Air Pollution Control, 177 South Broadway, Akron, Ohio 44308.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. During tank operation each owner or operator of an existing, new or reconstructed affected emissions unit shall control chromium emissions discharged to the atmosphere from that affected emissions unit by not allowing the concentration of total chromium in the exhaust gas to exceed 0.03 mg/dscm (1.3×10^{-5} gr/dscf) per tank.

2. At all times, including periods of startup, shutdown, and malfunction, any affected emissions unit must be operated and maintained consistent with the Operation and Maintenance Plan (O&M). Affected emissions units include associated air pollution control devices and monitoring equipment.

3. Malfunctions shall be corrected as soon as practicable and in accordance with the O&M.

4. If found to be deficient, the O&M shall be revised to the satisfaction of the Akron Regional Air Quality Management District.

5. The prepared O&M shall be implemented no later than the compliance date and shall include all the applicable elements listed in 63.342(f)(3)(i). If applicable, the O&M shall be incorporated into the Title V permit.

6. The O&M shall be revised if it fails to adequately address a malfunction event within 45 days of its occurrence. If the actions taken during the periods of malfunction were not those specified in the O&M, the permittee shall record the alternate actions taken and report them to the Administrator and Akron Regional Air Quality Management District within two working days after commencing these actions. The report shall be

followed by a letter, within seven working days after the end of the event, unless the permittee makes alternative reporting arrangements in advance with Akron Regional Air Quality Management District.

7. The O&M shall be retained, to be available for inspection, for the life of the affected emissions unit or until it is no longer subject to this rule. If the O&M is revised, the superseded versions shall be maintained for inspection for five years after each revision to the plan.

8. The standards that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.

9. The facility shall comply with the recordkeeping and reporting requirements associated with the O&M as identified in 63.346(b) and 63.347(g) respectively.

10. The permittee shall conduct an initial performance test as required under 63.7 using the procedures and methods listed in 63.7 subpart A and 63.344 subpart O.

11. Performance tests shall be conducted using the methods and procedures in section 63.344 of Subpart N and in section 63.7 of Subpart A. Test results shall be documented in reports containing the information required by 63.344(a)(1) through (a)(9). If requested, the test plan shall be made available to the Administrator, and Akron Regional Air Quality Management District, prior to testing.

12. The permittee shall comply with all applicable sections of this regulation (40 CFR 63 Subpart N) no later than January 25, 1997.

13. This facility shall demonstrate continuous compliance with its emission limits by conducting monitoring according to the type of air pollution control technique used.

    A. This facility shall comply with requirements of section 63.343(c)(1) of Subpart N when using a composite mesh-pad system.

14. This facility shall follow the special compliance provisions of section 63.344(e) of Subpart N.

15. This facility shall comply with all applicable reporting requirements of Subpart A as well as those described in section 63.347(c) of Subpart N, (Initial Notification Reports); section 63.347(d) of subpart N, (Notification of Performance Test); section 63.347(e) of subpart N, (Notification of Compliance Status); section 63.347(f) of subpart N (Reports of Performance Test Results); section 63.347(g) of subpart N, (Ongoing Compliance Status Reports for Major Sources); section 63.347(h) of subpart N, (Ongoing

Compliance Status Reports for Area Sources); and section 63.347(i) of subpart N, (Reports Associated with Trivalent Chromium Baths).