



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
LUCAS COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 04-01476

Fac ID: 0448011775

DATE: 5/17/2007

Stanley Measaw
Stanley Measaw
424 Burbank
Toledo, OH 43607

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

TDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 5/17/2007

FINAL PERMIT TO INSTALL 04-01476

Application Number: 04-01476
Facility ID: 0448011775
Permit Fee: **\$200**
Name of Facility: Stanley Measaw
Person to Contact: Stanley Measaw
Address: 424 Burbank
Toledo, OH 43607

Location of proposed air contaminant source(s) [emissions unit(s)]:

**424 Burbank
Toledo, Ohio**

Description of proposed emissions unit(s):

New facility for chromium plating of miscellaneous parts using a fume suppressant complying with a surface tension of 45 dynes/cm.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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.

4. 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

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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.

5. 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

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13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
Chromium	2.25×10^{-5}

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (P001) - Chromium plating tank of miscellaneous parts using a fume suppressant.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See Section A.2.a.
40 CFR Part 63, Subpart N	See Section A.2.b.
OAC rule 3745-17-07(B)(1)	Fugitive visible emissions from this emissions unit shall not exceed 20% opacity as a three minute average.
OAC rule 3745-17-08(B)	See Section A.2.c.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the chromium emissions from this air contaminant source since the uncontrolled potential to emit for the chromium emissions is less than 10 tons per year.
- 2.b The permittee, using a chemical fume suppressant containing a wetting agent, shall not allow the surface tension of the decorative chromium electroplating or anodizing bath(s), P001, to exceed 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter (2.4×10^{-3} pound-force/foot) as measured by a tensiometer at any time during tank operation. This limitation also applies during startup and shutdown operations, but not during periods of malfunction where work practice standards address and correct any malfunction event.
- 2.c The control measures specified by this rule are less stringent than the control measures established pursuant to 40 CFR Part 63, Subpart N.

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B. Operational Restrictions

1. The permittee shall implement the following operational, maintenance, and work practices standards for the chromium electroplating and anodizing tanks, excluding those using a trivalent chromium bath containing a wetting agent as a component ingredient in the bath:
 - a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the chromium electroplating or anodizing tank(s), including the associated air pollution control device(s) and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.
 - b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.
 - c. Determination of whether acceptable operation and maintenance procedures are being used shall be based on the facility records, which shall be made available to the regulating agency (City of Toledo Division of Environment Services) upon request, and which may include, but not be 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 regulating agency may require that the permittee make changes to the operation and maintenance plan if that plan:
 - i. does not address a malfunction that has occurred;
 - ii. fails to provide for the proper operation of the emissions unit, 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
 - iii. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control equipment, and/or monitoring equipment as quickly as practicable.
 - d. The standards and limitations 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.

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2. The permittee shall prepare an operation and maintenance plan to be implemented no later than the startup of the unit or the compliance date. The plan shall include the following elements:
 - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device, 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 plan shall incorporate the work practice standards for the add-on air pollution control device and monitoring equipment required to demonstrate compliance with the standard.
 - 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 device(s), and process and control system monitoring equipment, and for implementing corrective actions to address any malfunctions.
 - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.
 - 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 by phone to the regulating agency (City of Toledo Division of Environment Services) within 2 working days following the actions performed inconsistent with the plan. This verbal report shall be followed by a letter within 7 working days following the event, unless the permittee makes alternative reporting arrangements, in advance, with the regulating agency.
 - g. The permittee shall maintain the written operation and maintenance plan on record at the facility; and it shall be made readily available for inspection, at the

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request of the regulating agency and for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall maintain previous versions of the plan at the facility for a period of five years following each revision; the superceded version(s) of the plan shall also be made available for inspection, if so requested by the regulating agency.

- 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 of 40 CFR 63.342(f)(3).
3. The operation and maintenance plan shall incorporate the maintenance and operational practices recommended by the manufacturer of the stalagmometer or tensiometer, which shall be used to measure surface tension of the electroplating or anodizing bath. Until performance testing is conducted and an alternative parameter limitation is established, the surface tension of the electroplating or anodizing bath shall not to exceed 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter (2.4×10^{-3} pound-force/foot) as measured by a tensiometer at any time during tank operation.

C. Monitoring and/or Recordkeeping Requirements

1. In addition to fulfilling all record keeping requirements contained in the General Provisions to 40 CFR Part 63, Subpart A, as they apply to the emissions unit, the permittee shall also 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 contained in this permit have been performed. 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;

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- 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" section of this permit and the general reporting requirements in 40 CFR 63.9 and 40 CFR 63.10, from subpart A; and
- m. records of the date and time that fume suppressants are added to the electroplating or anodizing bath.

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

- 2. The permittee shall perform the following monitoring and record keeping requirements in order to demonstrate compliance through the use of the wetting agent or combination wetting agent/foam blanket fume suppressant:
 - a. During the initial performance test, the permittee shall determine the outlet chromium concentration using Method 306 or 306A as required in the "Testing

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Requirements" section of this permit, to demonstrate compliance with the emission limitation through the use of a wetting agent or combination wetting agent/foam blanket fume suppressant. The surface tension of the bath, measured as specified in Method 306B (from 40 CFR Part 63, Appendix A of Subpart N), shall be established as the site-specific operating parameter, setting the maximum value as that established during the compliant performance test.

- b. In lieu of establishing the maximum surface tension during the performance test for chromium emissions, the permittee may instead establish 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter (2.4×10^{-3} pound-force/foot) as measured by a tensiometer as the maximum surface tension value that corresponds to compliance with the applicable emission limitation using only Method 306B, as allowed per 40 CFR 63.342(c)(1)(iii), (c)(2)(iii) or (d)(2). The owner or operator is exempt from conducting a performance test only if the criteria of 40 CFR 63.343(b)(2) are met.
- c. On and after the date on which the initial performance test is or was required to be completed under 40 CFR 63.7, the permittee shall monitor the surface tension of the electroplating or anodizing bath according to the schedule in paragraph "d" below. Operation of the emissions unit at a surface tension less than or equal to the value established during the performance test, or no greater than 45 dynes per centimeter (3.1×10^{-3} pound-force/foot) as measured by a stalagmometer or 35 dynes per centimeter (2.4×10^{-3} pound-force/foot) as measured by a tensiometer, if the permittee is using this value as the maximum surface tension value, shall constitute compliance with the standard.
- d. The surface tension shall be monitored using either a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Appendix A of Subpart N and according to the following schedule:
 - i. Following the compliance date, the surface tension shall be measured once every four hours during tank operation.
 - ii. The time between monitoring can be increased if there have been no exceedances. If there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Again if there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an

Emissions Unit ID: **P001**

exceedance occurs. The minimum frequency of surface tension measurements shall be once in every 40 hours of tank operation.

- iii. Once an exceedance has occurred, as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed and a subsequent decrease in frequency shall follow the schedule in paragraph (ii) above.
- iv. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in paragraph (ii) above.

D. 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 City of Toledo Division of Environmental Services.
2. The permittee shall report, to the regulating agency (appropriate Ohio EPA Division of Air Pollution Control, District Office or local air agency), the results of any performance test conducted within 30 days of completion of such test. Reports of performance test results shall also be submitted in the "Notification of Compliance Status Report", no later than 90 days following the completion of the performance test. Performance test results shall be documented in complete test reports that contain the following information:
 - a. a brief description of the process;
 - b. a description of the sampling location(s);
 - c. a description of sampling and analytical procedures and any modifications to standard procedures;
 - d. the test results;
 - e. quality assurance procedures and results;
 - f. records of operating conditions during testing, preparation of standards, and calibration procedures;
 - g. raw data sheets for field sampling and field and laboratory analyses;
 - h. documentation of calculations; and
 - i. any other information required by the test method.

The permittee shall have sufficient data to establish the operating parameter value(s) that corresponds to compliance as required for continuous compliance monitoring.

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3. The permittee shall submit a "Notification of Compliance Status Report" to the regulating agency (City of Toledo Division of Environment Services), signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit(s) is/are in compliance. The notification shall include the following information for each chromium electroplating tank subject to the NESHP:
 - a. the applicable emission limitation and the methods that were used to determine compliance with this limitation;
 - b. the surface tension measurement and frequency of each measurement during the reporting period;
 - c. for each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;
 - d. the methods that shall be used to determine continuous compliance;
 - e. a description of the air pollution control method(s) used for each emission point;
 - f. a statement that the permittee has completed and maintains an operation and maintenance plan as required by the work practice standards; and
 - g. a statement by the permittee as to whether the emissions unit is in compliance.

The permittee shall have sufficient data to establish the operating parameter value(s) that corresponds to compliance as required for continuous compliance monitoring. Reports of performance test results shall be submitted in the "Notification of Compliance Status Report" no later than 90 days following the completion of the compliance demonstration. For emissions units not required to complete a performance test in accordance with 40 CFR 63.343(b), the "Notification of Compliance Status Report" shall be submitted no later than 30 days following the compliance date.

4. The permittee, qualifying as an area source, shall prepare an annual "Summary Report" ("Ongoing Compliance Status Report") to document ongoing compliance. The "Summary Report" shall be maintained onsite and made available to the regulating agency (City of Toledo Division of Environment Services) upon request. This report shall include the following:

Emissions Unit ID: **P001**

- a. the company name and address of the emissions unit;
- b. a description of the source, type of process performed, and the air pollution control method and monitoring device(s) that is/are/shall be used to demonstrate continuous compliance;
- c. an identification of the operating parameter(s) that is/are/shall be monitored for compliance determination;
- d. the relevant emission limitation for the emissions unit, and the operating parameter value(s), or range of values, established during compliance testing and reported in the notification of compliance status report(s);
- e. the beginning and ending dates of the reporting period;
- f. the total operating time of the emissions unit during the reporting period;
- g. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period; and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- h. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;
- i. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;
- j. a description of any changes in monitoring, processes, or controls since the last reporting period;
- k. the date of the report;
- l. the name, title, and signature of the responsible official who is certifying the

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accuracy of the report; and

- m. the report shall be completed annually and retained on site, and made available to the regulating agency upon request.

The "Summary Report" shall be prepared annually, unless it is determined that more frequent reporting is required; semiannual reports shall be prepared and submitted to the regulating agency (City of Toledo Division of Environment Services) if both of the following conditions are met:

- a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
- b. the total duration of malfunctions of the add-on air pollution control device and/or monitoring equipment is 5 percent or greater of the total operating time.

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

- 5. The regulating agency may determine, on a case-by-case basis, if the "Summary Report" ("Ongoing Compliance Status Report") shall be completed more frequently than annually or if to require it be submitted (rather than retained onsite), if these measures are necessary to accurately assess the compliance status of the emissions unit(s).
- 6. The permittee, who qualifies as an area source but has been required to submit "Summary Reports" on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual (or semi-annual if quarterly) and/or may be permitted to maintain the report on site, rather than submit the annual or semi-annual report, if all of the following conditions are met:
 - a. for 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit;
 - b. the permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR Part 63, subpart A and this permit; and

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- c. the regulating agency does not object to a reduced reporting frequency.

The frequency of completing and/or submitting the "Summary Reports" may be reduced or the report maintained on site (not required to be submitted) only after the permittee notifies the regulating agency in writing of the intention to make the change and the same agency does not object. In deciding whether to approve a reduced reporting frequency or to allow the report to be retained on site, the Ohio EPA regulating agency may request to review information concerning the facility's previous performance history during the 5-year record keeping period prior to the intended change in reporting frequency, or the record keeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. If the permittee's request is disapproved, the regulating agency will notify the permittee in writing within 45 days after receiving notice. This notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

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 semiannually, and the permittee shall document this exceedance in the "Ongoing Compliance Status/Summary 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.

E. Testing Requirements

1. The permittee, using a wetting agent in the electroplating or anodizing bath to inhibit chromium emissions, shall conduct, or have conducted, the following testing in order to demonstrate continuous compliance with the surface tension limitation established in this permit:
 - a. Method 306B, "Surface Tension Measurement and Record keeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities," shall be used to measure the surface tension of the electroplating and/or anodizing bath.
 - b. The stalagmometer or tensiometer shall be operated such that representative measurements of the surface tension are obtained. The manufacturer's written accuracy specifications or recommendations for operation and calibration of the instrument shall be used to verify the operational status of the equipment.

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- c. A representative from the regulating agency shall be permitted to witness the measurement(s), upon request.

If the permittee accepts a surface tension limit of 45 dynes/cm as measured by a stalagmometer or 35 dynes/cm as measured by a tensiometer and conducts continuous compliance monitoring as required in 40 CFR 63.343(c)(5)(ii) and this permit, by reading and recording the surface tension once every 4 hours for the first 40 hours of tank operation; then once every 8 hours of tank operation for an additional 40 hours of tank operations if there are no exceedances during the first 40 hours; and if there are still no exceedances, the minimum frequency of surface tension monitoring shall be once every 40 hours of tank operation. Once an exceedance occurs, the "once every 8 hour" frequency resumes, and a reduction of the monitoring frequency shall follow the requirements contained in this permit.

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

- a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation from this emissions unit shall be determined in accordance with Test Method 9 set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1997 and the modifications listed in OAC rule 3745-17-03(B)(3).

- b. Emission Limitation:

Chromium emissions shall be less than ten tons per year.

Applicable Compliance Method:

The following equation (based on AP-42, "Compilation of Air Pollution Emission Factors" Section 12.20) shall be used:

$$E(\text{PTE}) = (E_c) (100) (AC) (8760 \text{ hr/yr}) / (7000 \text{ grains/lb}) (2000 \text{ lb/ton})$$

Stanley Measaw

DTL Application: 04 04176

Facility ID: 0448011775Emissions Unit ID: **P001**

E(PTE) = chromium emissions at 8760 hours per year;

$E_c = 1.2 \times 10^{-6}$ grains/dscf (emission factor for decorative chromium electroplating with fume suppressant from AP-42, Section 12.20, Table 12.20-1(7/96));

100 = conversion factor for converting grains/dscf to grains/amp-hr (per AP-42, "Compilation of Air Pollution Emission Factors" Section 12.20, table 12.20-1); and

AC = 300 amp maximum design capacity with an average use of 100 amps (2 amps/gallon for a 50 gallon bath of chromium solution).

F. Miscellaneous Requirements

None

Stanley Measaw
PTI Application: 04-01476
Issued: 5/17/2007

Facility ID: 0448011775

Emissions Unit ID: **P001**

SIC CODE 3471 SCC CODE 30901028 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION Chromium plating tank of miscellaneous parts using a fume suppressant.

DATE INSTALLED _____

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	Chromium			1.71 x 10 ⁻⁶ lb/hr	7.51 x 10 ⁻⁶

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? N

PSD? No

OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

None per SB265

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____