



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

**Certified Mail: 70102780000197061722**

December 7, 2012

Brian Franz, Owner  
Hidden Valley Chrome  
1877 East High Ave.  
New Philadelphia, OH 44663

Re: Tuscarawas County  
Hidden Valley Chrome; Facility ID 0679020179  
Notice of Violation (Non-HPV)

Dear Mr. Franz:

On October 15, 2012, Ohio EPA, Division of Air Pollution Control (DAPC), Southeast District Office (SEDO) visited the Hidden Valley Chrome facility located at 1877 East High Ave. in New Philadelphia, Ohio. The purpose of this visit was to determine whether the company was still in operation and if so, whether Hidden Valley Chrome is operating in compliance with state and federal air pollution laws and rules and the requirements of the now-expired operating permits for the two chrome plating tanks, emissions units (EUs) P001 and P002.

Based on a tour of the facility and a review of information obtained during and subsequent to the site visit, the following violations have been documented:

- (1) ***PTO Renewal Application Submittal.*** In order to continue operating under expiring operating permits, permittees must submit renewal applications prior to the expiration dates of those permits. Then, pursuant to Ohio Revised Code (ORC) § 119.06, operators may continue to operate under the expired permits even if the permitting authority fails to issue renewal permits prior to their expiration date(s). The PTOs for EUs P001 (Hard Chrome Tank #1) and P002 (Hard Chrome Tank #2) expired on January 30, 2011. Although Hidden Valley Chrome was notified about this issue on February 23, 2011 via telephone and email, a PTO renewal application was not received from the company until June 8, 2011.

This violation will remain unresolved until final operating permits are issued for the two plating tanks. However, please note that the violations of 40 CFR Part 63, Subpart N, listed below must be resolved before the renewal operating permits can be issued for these EUs.

- (2) ***Packed bed scrubber/composite mesh-pad system, 40 CFR 63.343(c)(3) and (c)(1)(ii) and 63.346(b)(8) and (c).*** The owner or operator shall monitor and record the pressure drop across the composite mesh-pad system once each day that any affected source is operating. The owner or operator shall maintain records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard. All records shall be maintained for a period of 5 years, and pursuant to 40 CFR 63.10(b)(1), at least two years of monitoring data are required to be kept on site.

On the day of the site visit, Hidden Valley Chrome had no documentation on site to demonstrate that the required pressure drop monitoring is occurring. The pitot tube used to measure pressure drop on Hard Chrome Tank #2 was covered in debris and the pressure differential could not be determined without first wiping off the pitot tube.

To address this violation, the company must immediately begin recording the pressure drop across the composite mesh-pad system for each tank at least once each day the tanks are operated. Each daily reading for each tank must be recorded in a log that is kept on site for a minimum of two years from the date the readings are taken. With your response to this letter, please provide copies of the logs used to record daily pressure drop readings to demonstrate that the required pressure drop monitoring is now being performed.

- (3) ***Operation and maintenance (O&M) practices and O&M Plan, 40 CFR 63.342(f) and 63.346(b)(8) and (c).*** All owners and operators subject to an emission limitation in 40 CFR 63.342(c) are subject to the O&M maintenance practices in Table 1 of 40 CFR 63.342, and shall prepare and maintain a written O&M plan on site that specifies how compliance with the O&M practices in Table 1 and housekeeping practices in Table 2 to 63.342 will be implemented. The owner or operator must maintain records of inspections of the air pollution control device, maintenance performed, malfunctions that have occurred, and test reports documenting the results of performance tests. All records shall be maintained for a period of 5 years, and pursuant to 40 CFR 63.10(b)(1), at least two years of monitoring data are required to be kept on site.

Although it appears an O&M Plan was prepared for the two hard chrome plating tanks at Hidden Valley Chrome in 2003 (a copy is enclosed), that plan does not comply with the content requirements outlined in 40 CFR 63.342(f)(3); a copy of the rule is also enclosed. The company is not maintaining an O&M plan on site, and Hidden Valley Chrome is not maintaining any records to demonstrate that the required O&M practices, including the requirements of Tables 1 and 2 of 40 CFR 63.342, are being followed. A copy of the performance test report was not available.

To address this violation, Hidden Valley Chrome must prepare an updated O&M plan that covers all of the requirements in 40 CFR 63.342(f), and a copy of the updated O&M plan must be maintained on site and submitted to DAPC, SEDO. The company must implement all practices outlined in the updated O&M plan at the frequencies required in Tables 1 and 2 of 40 CFR 63.342. Hidden Valley Chrome must keep records to demonstrate that the required O&M practices are being implemented, including the results of all inspections and maintenance activities for the packed bed scrubber/composite mesh-pad system. With your response to this letter, please provide copies of the logs now being used to document the company's O&M activities related to the hard chrome tanks and their controls and a copy of the performance test report for the stack testing of the two control devices that occurred in the 1990's or early 2000's.

- (4) ***Initial Notification of Compliance Status Report, 40 CFR 63.347(e).*** A notification of compliance status is required each time an affected source becomes subject to 40 CFR Part 63, Subpart N. The notification must include the information outlined in 40 CFR 63.347(e)(2) and (3).

DAPC, SEDO has no documentation in its files to confirm that Hidden Valley Chrome ever prepared and submitted an initial notice of compliance status report for EUs P001 and P002. To address this violation, the company must prepare the initial notice, ensuring that all of the information required to be submitted is provided, and with your response to this letter, provide a copy of that notice to DAPC, SEDO.

- (5) ***Ongoing compliance status reports for area sources, 40 CFR 63.347(h).*** The owner or operator of an affected source located at an area source site shall, on an annual basis, prepare and retain on site an ongoing compliance status report documenting the company's status of compliance with 40 CFR Part 63, Subpart N.

At the time of the site visit, Hidden Valley Chrome had no annual ongoing compliance status reports available on site. DAPC, SEDO's records include copies of ongoing compliance status reports through 12/14/02.

To address this violation, Hidden Valley Chrome must prepare and submit to DAPC, SEDO, annual ongoing compliance status reports for calendar years 2003 through the present.

***Within 30 days of your receipt of this letter,*** Hidden Valley Chrome must provide Ohio EPA with a compliance plan and schedule that outlines the steps that the company will take to correct the violations identified above and ensure future compliance with all applicable federal and state air pollution control laws and rules. Acceptance by Ohio EPA of a schedule for compliance does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The

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determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

Thank you for your assistance during the site visit and for your cooperation in resolving all violations and other air permitting deficiencies outlined herein. If you have any questions or need assistance responding to this letter, please contact me at (740) 380-5245 or via email at [kim.reinbold@epa.state.oh.us](mailto:kim.reinbold@epa.state.oh.us).

Sincerely,



Kimbra L. Reinbold  
Division of Air Pollution Control  
Southeast District Office

KLR/cs

cc: Dean Ponchak, DAPC-SEDO