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Thomas D.Kmiec

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**SENT by FAX**

March 02, 2009

Bryan Sokolowski  
Cleveland Division of Air Quality  
Ohio EPA - Agency 13 - Cuyahoga County  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, OH 44114

**Facility ID 13-18-00-1881**

**RE: Woodhill Plating Company (Woodhill); 9114 Reno Avenue; Cleveland, OH 44105  
Automated, Nickel/Chrome Electroplating Line**

Dear Mr Sokolowski:

Just a belated note to thank you for the courtesies and professionalism extended to me by you and Ms. Shalena Harris during my Records Review in your office on Friday, February 20<sup>th</sup>. I have been reviewing my notes and there is one item about which I am not sure.

It is my understanding from our meeting that, because trivalent chrome plating is addressed in the USEPA Regulations published in 40 CFR 63, Subpart N [specifically at 40 CFR 63.342(e)], Woodhill cannot take advantage of the OEPA DeMinimis Permit Exemption published in OAC 3745-15-05 even though the projected, calculated, 24-hour regulated airborne emissions are well below ten (10) pounds/day (see Table 1).

The following are the Federal Regulations that address "Standards for Decorative Chromium Electroplating Tanks using a Trivalent Chromium Bath":

- 40 CFR 63.342(e) - . . . "wetting agent in the bath" . . . ,
- 40 CFR 63.346(b)(14) - . . . "recordkeeping requirements" . . . , and
- 40 CFR 63.347(a)(1)(3) - . . . "reporting requirements" . . . .

To the best of my knowledge, none of these regulations limit regulated airborne emissions from this process at below ten (10) pounds in 24-hours [OAC 3745-15-05[C](1) & (2)].

For the reasons enumerated above, it is still my opinion that this subject Emissions Unit is exempted from obtaining an OEPA PTIO under OAC 3745-15-05.

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For your information, because of the time constraints, I am continuing with the preparation of the Application for a PTIO which is due next Monday (03/09/09).

Please advise.

Thank you for your cooperation.

Sincerely,



Thomas D. Kmicc, J.D., P.E.  
Professional Engineer

cc: John Sporano/Woodhill Plating Company