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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)
)
Achromic Corporation) **FINDING OF VIOLATION**
Ashtabula, Ohio)
) **EPA-5-99-OH-32**
)
Proceedings Pursuant to)
the Clean Air Act,)
42 U.S.C. §§ 7401 et seq.)

FINDING OF VIOLATION

The U.S. Environmental Protection Agency (U.S. EPA) hereby notifies the State of Ohio and Achromic Corporation (Achromic) that U.S. EPA finds that the Achromic hard chrome plating facility, located at 5015 Benefit Avenue, Ashtabula, Ohio, is in violation of Section 112 of the Clean Air Act, 42 U.S.C. § 7412, and regulations promulgated thereunder setting forth National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 C.F.R. Part 63. Specifically, Achromic is in violation of the Chromium Electroplating and Anodizing NESHAP and the Clean Air Act as follows:

1. Achromic owns and operates 3 hard chromium electroplating tanks at their facility. The tanks are subject to the provisions of 40 C.F.R. Part 63 Subpart N.
2. The maximum cumulative potential capacity for the compressors at the Achromic facility is less than 60 million ampere-hours per year. Therefore, pursuant to 40 C.F.R. § 63.341, the Achromic facility is a small hard chromium electroplating facility. Tanks 1, 2 and 3 are "existing sources" as defined at 40 C.F.R. 63.2. Each hard chromium electroplating tank at the Achromic facility must meet an emission limit of 0.03 mg/dscm under 40 C.F.R. § 63.342(c)(1)(ii).
3. 40 C.F.R. § 63.342(a) required Achromic to comply with the emission limit set forth in § 63.342(c)(1)(ii) on and after the compliance date specified in §63.343(a)(1)(ii), i.e. January 25, 1997. 40 C.F.R. § 63.7(a)(2)(iii) required

Achromic to conduct performance testing to demonstrate compliance of each of the tanks with this emission limit no later than July 24, 1997 (180 days after the compliance date specified in § 63.343(a)(1)(ii)).

4. On July 2, 1997, Achromic conducted performance tests on Tanks 1 and 3. Ohio EPA attended the performance tests. Achromic did not test Tank 2.
5. On December 9, 1997, U.S. EPA received a letter from Ohio EPA that summarized the results from the July 2, 1997 performance tests. This Ohio EPA letter reported that Achromic had failed to demonstrate compliance on Tanks 1 and 3.
6. The results from the 1997 test were:

<u>Stack</u>	<u>Actual Emission</u>	<u>Emission Limit</u>
P001	.05075 mg/dscm	.03 mg/dscm
P003	.03142 mg/dscm	.03 mg/dscm

7. On January 27, 1998, Achromic conducted a re-test on Tank 1. Ohio EPA attended the test. The January 27, 1998 test demonstrated compliance with the emission limit.
8. On July 30, 1998, Achromic conducted a re-test on Tank 3. Ohio EPA attended the test. The July 30, 1998 test demonstrated compliance with the emission limit.
9. Achromic exceeded the emission limit in 40 C.F.R. §63.342(c)(1)(ii) for Tank 1 on and after January 25, 1997, in violation of 40 C.F.R. §63.342(a).
10. Achromic did not have a complete Operation and Maintenance Plan, in violation of 40 C.F.R. §63.342(f)(3).
11. Achromic did not monitor and record the pressure drops across the composite mesh-pad systems once each day that the tanks were in operation, in violation of 40 C.F.R. §63.343(c)(1)(ii).

7/2/99
Date


Margaret M. Guerriero,
Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, do hereby certify that a Finding of Violation was sent by Certified Mail, Return Receipt Requested, to:

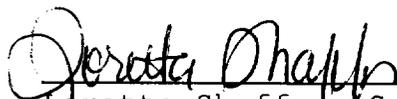
William Keehl, President
Achromic Corporation
5015 Benefit Avenue
Ashtabula, Ohio 44002-6530

I also certify that copies of the Finding of Violation were sent by first class mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
Central District Office
1800 Watermark Drive
Columbus, Ohio 43216

Kristen Sweitzer, Environmental Specialist
Division of Air Pollution Control
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-0769

on the 02 day of JUL, 1999.



Loretta Shaffer, Secretary
AECAS, (MN/OH)

CERTIFIED MAIL RECEIPT NUMBER: P 140 777320