

Department of Environmental Protection

Lawton Chiles Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Virginia B. Wetherell Secretary

January 21, 1996

Mr. Robert A. Cogan Accurate Plating & Weaponry, Inc. 940 Harbor Lake Drive Safety Harbor, Florida 33695

Re: Facility I.D. No. 1030360

Dear Mr. Cogan:

The Department has received the Title V General Permit Notification Form for the chromium electroplating and anodizing facility that you submitted on October 28, 1996.

Please note that in January of each year the Department will be mailing fee notices to those facilities using the Title V general permit. This annual operation fee is \$50 and it is due and payable between January 15 and March 1 of each year the facility is in operation and is subject to the requirements of the Title V general permit.

If you have or expect to have any changes in your mailing address, location address, responsible official, or phone number, please notify the Department at the following address:

Title V General Permits Office Bureau of Air Monitoring and Mobile Sources MS 5510 Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Fl 32399-2400

If there are any changes in the facility status, including change of operating parameters or equipment, or if you have any additional questions regarding the Title V General Permit Program, please contact the District or local air program compliance inspector in your area.

Sincerely,

Dotty Diltz, Chief

Bureau of Air Monitoring

and Mobile Sources

/DD

cc: Mr. Louis Fernandez, Southwest District

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

RECEIVED

CHROMIUM ELECTROPLATING/ANODIZINGMAY 1 9 1999

V

TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

Bureau of Air Monitoring & Mobile Sources

	ANNUAL RE-INSPECTION	0	COMPLAINT/DISCOVERY	
AIRS ID#: 1030360 FACILITY NAME:	DATE: 1/6/95 Accurate 8	TIME IN: _	/:/5 TIME OUT:	2:30
FACILITY LOCATION:	940 Harb	or Lake	Dr.	
	Safety Ha	rbor -	34695	·
RESPONSIBLE OFFICIAL	: Robert Cog	an	PHONE: 727- 796-	-5943
CONTACT NAME:	ι,		PHONE:	
,		r.		
PART I: NOTIFICATION				
(check appropriate box) 1. New facility notified DARI	M 30 days prior to startu	n	·	
New facility floatined DAN 2. Facility failed to notify DA		-		ļ
	-			
PART II: CLASSIFICATION	٧			
Facility type(s)/applicable stan	dard indicated on notific	cation form:		.0
Hard Chromium Plating				Í
a. Existing Large (0.015 mg/	/dscm) 🚨 b.	. Existing Sm	all (0.03 mg/dscm)	
c. New (0.015 mg/dscm)	□ d.	(0.03 mg/ds	Standard for existing facilities cm) using a rolling average of acity (less than 60 million A-hr/y	(ear)
Decorative Chromium Platin	ng/Anodizing			
a. Chromic Acid Bath	Emissions of ≤ 0.01	1/mg/dscm (4.4	4x10 ⁻⁶ gr/dscf)	
	Surface tension of May only be selected if	\leq 45 dynes/cm a wetting agent is	ı (3.1x10 ⁻³ lb-f/ft) used.	Q /
b. Trivalent Chromium Bath	With wetting agent			
	Without wetting ag	ent ≤ 0.01 mg/c	dscm (4.4x10 ⁻⁶ gr/dscf)	
c. Chromium Anodizing	Emissions of < 0.01	1 ma/daam (1 /	1×10-6 ar/deaf	_
	Emissions of \(\sqrt{0.0} \).	i mg/uscm (4.	+x10 gi/usci)	

C	ontrol de	vice					
	selecte	S. Carlotte March	In	use?			
1.	. 🗅	Composite Mesh Pad	ΠY	DИ			
2.	. 🗅	Fiber Bed Mist Eliminator	ΠY	□N	•		
3.		Packed Bed Scrubber	ΠY	□N			
4.		Packed Bed Scrubber/Composite Mesh Pac	ďΥ	□N			
5.	ū	Foam Blanket Fume Suppressant	ΠY	□N			
6.	Ø	Fume Suppressant w/ Wetting Agent	₫Y	ПN	. ,		
Has the facility conducted an initial performance test to establish monitoring parameters? (Not required for sources using a wetting agent or 1-inch foam blanket thickness)							

X

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X

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PA	PART IV: RECORDKEEPING AND REPORTING REQUIREMENTS							
Has	the responsible official maintained the follo	wing records?						
	1. Quarterly inspection records for add-on air pollution control devices and monitoring equipment. (applicable only to a facility using a packed bed scrubber, fiber-bed mist eliminator, or composite mesh pad)							
II	Operations and Maintenance Plan (OMP). (app scrubber, fiber-bed mist eliminator, or composite mesh po	ØY □N	□N/A					
3.	Maintenance records for the source, add-on poequipment (equipment identified, date perform	_	OY ON					
4.	Records of date of occurrence, duration, cause malfunction of process, add-on pollution contra	•	DY ON					
5.	Results of all performance tests.		□Y □N	₽N/A				
6.	Records of monitoring data. (not applicable to triv	alent chromium baths using a wetting agent)	DY ON	POHA				
	Composite Mesh Pad Measure the pressure drop across the CMP daily.	Packed Bed Scrubber Measure the pressure drop across the PBS and the inlet velocity daily.	:					
	Fiber-Bed Mist Eliminator Measure the pressure drop across the FBME and the upstream device daily.	Packed Bed Scrubber/Composite Mes Measure the pressure drop across the CMP daily.						
	Foam Blanket Fume Suppressant Measure the foam blanket thickness at the appropriate interval.	Fume Suppressant w/ Wetting Agent Measure the surface tension at the appropriate int	erval.					
7.	Purchase records of wetting agent components	i.	OY ON	□N/A				
8.	Records of the date and time that fume suppres	OY ON	□N/A					
9.	Records of rectifier capacity, if used to determ	□Y □N	□n/a ,					
10.	10. Records of the total process operating time.							
11.	Records identifying specific periods of excess	emissions. no 2xc2SS emissions.	DY MY	v				
12.	Startup, Shutdown & Malfunction Plan		MO AM					

PART V: ADDITIONAL SITE INFORMATION	

Majar O. Serves
Inspector's Signature

199 Date of Inspection

3/2-000 Approximate Date of Next Inspection

YPE OF INSPECT	ION: ANNUA	AL ® C	OMPLAINT/DI	SCOVERY 🗆	RE-INSPE	ECTION
TIME IN:	4/6/99- 1:15	TIME OUT:	2:30	AIRS I	ID# 10303 6	30
TYPE OF FACI	LITY: Chro	mium Electro	olating and	Anodizing	•	
FACILITY NAM	ME: Acc	curate Plating	and Weapo	nery DATI	E: 4/6/99	9
FACILITY LOC	CATION: 940	0 Harbor Lake	Drive, Safe	ty Harbor, FL 34	695	
RESPONSIBLE	OFFICIAL: Ro	bert Cogan_		PHONE NUME	BER: (727	796-5943
to be in cor Based on the	mpliance with DEI	P Rule 62-213.30 mpliance require	0, Florida Ad	ed during this insp ministrative Code ted during this insp	(F.A.C.).	
Comments: I:\USERS\AIRQU	UAL\WPDOCS\A	QI\03600199.MV	/H)			
					· .	
						,
The Annual Complian	nce Certification form NSPECTION:	has been properly ce	rtified and subn	nitted to the inspector.	Yes 🗹	No □
NSPECTION CON	DUCTED BY:	Margaret	Hennis	(Please Print)		
NSPECTOR'S SIC	SNATURE: 7	- 20.4fi	PH	(Please Print) ONE NUMBER:	127-00 Y	104-4422

Page __ of __

Revised 10/96

AIRS ID#: /030360

Revised 10/10/96

CHROMIUM ELECTROPLATING/ANODIZING AIR QUALITY GENERAL PERMIT ANNUAL COMPLIANCE CERTIFICATION FORM

FACILITY NAME: Accurate. Plating & Weaponery DATE: 44/99
FACILITY NAME: Accurate. Plasing & Weaponery DATE: 41/99 FACILITY LOCATION: 940 Harbor Lake Dr.
Safety Harbor, FL 346 95
Annual Reporting Period: Pebruary 23 1998 TO April 6 1999
Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement.
If NO, complete the following:
#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:
Exact period of non-compliance: from
Action(s) taken to achieve compliance:
Method used to demonstrate compliance:
#2. Term or condition of the general permit that has not been in continuous compliance during the reporting periods that has not been in continuous compliance during the reporting periods that has not been in continuous compliance.
Exact period of non-compliance: from
Action(s) taken to achieve compliance:
Method used to demonstrate compliance:
As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. RESPONSIBLE OFFICIAL: Responsible OFFICIAL: Name (Please Print) Name (Please Print)

^{*}This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.

Pf 22 of 22:

Drieds to Check (C)

equipment orangement on

Orecas to Check (i)

excess emissions

doesn't heed to kheel

(d) ap + oranitenance

Checklist.

please see if these

lop are present.

October 24, 1996

Sandy Bowman Bureau of Air Monitoring and Mobile Sources 2600 Blair Stone Rd. Tallahassee, FL 32399

Re: O & M plan for Decorative Chrome plating facility

Dear Ms. Bowman:

This is a general permit application that we received from Accurate Plating. I am forwarding a copy to BAMM's in the event that we received the only copy. Mr. Cogan also submitted a proposed O&M plan for use at his facility. He would like for someone at FDEP, such as an air toxics engineer, to review what he is proposing to use, and, if possible, receive some kind of written confirmation that the O&M plan meets the requirements of the rule.

If you require any additional assistance, please do not hesitate to contact me.

Sincerely,

Margaret Hennis

Environmental Specialist II

Chromium Electroplating and Anodizing Facilities Notification

Facility Name and Location

1. Facility Owner/Company Name (Name of corporation, agency, or individual owner):
ACCURATE PLATING & WEAPONRY INC., ROBERT A. COGAN 1 2. Site Name (For example, plant name or number):
3. Hazardous Waste Generator Identification Number:
4. Facility Location: Street Address: 940 HARBOR LAKE DR.
City: SAFETY HARBOR County: PINELLAS Zip Code: 34695
5. Facility Identification Number (DEP Use): 1030360
Responsible Official
6. Name and Title of Responsible Official: ROBERT A. COBAN PRES.
7. Responsible Official Mailing Address: Organization/Firm: ACCURATE PLATING & WEAPONRY INC. Street Address: 940 HARBOR LAKE DR. City: Zin Code:
SAFETY HARBOR. PINEUAS 34695 8. Responsible Official Telephone Number:
Telephone: () - Fax: () -
Facility Contact (If different from Responsible Official)
9. Name and Title of Facility Contact (For example, plant manager):
10. Facility Contact Address:
Street Address:
City: County: Zip Code:
11. Facility Contact Telephone Number: Telephone: () - Fax: () -
R

OCT 2 8 1996

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1.b. Provide the information below for each decorative electroplating or anodizing machine at the facility. Indicate the type of machine, the date of its purchase, and the date the control device was installed, if applicable.

	DECORATIVE	AND	ANODIZING	TANKS
TANK ID#	DATE PURCHASED	DATE CNTRL DEVICE INSTALLED	CONTROL DEVICE (see key)	APPLICABLE STANDARD (see key)
TANK A.	10-92	10-92	FS/WA.	У
CURRENT LOC.	5-94		,	
TANK B.	10-92-	10-92	FS/WA	y
CURRENTLOG.	5-94		,	
TANK C	10-92	10-92	FS/WA	Y
CURRENTLA	5-94			
TANK D.	10-92	10-92	FS/WA.	Y
CURRENTLOS	5-94		/	

MOVED TO CURRENT LOCATION 5-94

Key for Control Device Type

PBS = packed-bed scrubber

CMP = composite mesh pad

PBS/CMP = packed-bed scrubber and composite mesh pad

FS = fume suppressant only

FS/WA = fume suppressant with a wetting agent

FM = fiber-bed mist eliminator

Applicable Standard Key

x = 0.01 mg/dscm

y = 45 dynes/cm

z = records of bath components (trivalent Cr tanks only)

c = alternative standard for multiple tanks under common control

 Ind 	cate the date by	which the facilit	y must meet the rec	quirements of section	ر5) ا) of Part 1	l of this	form
-------------------------	------------------	-------------------	---------------------	-----------------------	-------	-------------	-----------	------

[January 25, 1996 [] January 25, 1997

3. Indicate how the facility will fulfill the compliance demonstration:

[____] The facility will conduct an initial performance test

The facility will use a wetting agent to reduce emissions and will meet the existing surface tension limit in No. 3 above.

DEP Form No. 62-213.900(5) Effective: 6-25-96

Equipment Monitoring and Recordkeeping Information

Check all logs which are required to be kept on-site in accordance with the requirements of this general permit:						
(a) Equipment maintenance		(b) Equipment inspection and repair	[]			
(c) Equipment malfunctions		(d) Operation and maintenance checklist				
(e) Instrument calibration		(f) Start-up, shutdown, malfunction plan				
(g) Performance test results		(h) Equipment monitoring				
(i) Excess emissions	[]	(j) Operating periods				
(k) Rectifier capacity	[]	(I) Fume suppressant records				
(m) Purchase records of wetting	g agent components					
	Surrender of E	Existing Air Permit(s)				
Please indicate with an "X" the	appropriate selection	:	•			
		mits authorizing operation of the form; specifically, permit number(s)				
No air permits this notification		operation of the facility indicated in				
	Responsible (Official Certification				
I, the undersigned, am the responsible official, as defined in Part II of this form, of the facility addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described above so as to comply with all terms and conditions of this general permit as set forth in Part II of this notification form.						
I will promptly notify the Department of any changes to the information contained in this notification.						
Rollert A. Cayan 10-15-96. Signature Date						

DEP Form No. 62-213.900(5) Effective: 6-25-96

Accurate Plating & Weaponry, Inc. 940 Harbor Lake Dr. Safety Harbor, FL

October 7, 1996

Tank ID#	Type of tank	Startup date ¹		Description of parts plated	Fume So WITH WES	IPRESE	U)- EN T.
				& FREARMS +	Lo-MI		_
C	DEC. CHROME	10-92	500 AM		CHICAGO		
BLA	CK CHROME	10-92	250 Ans				
Acc	TANKS ARE	LOCA	TEO IX	THE S.E. SECT	ION OF BU	ILDING	
					· · · · · · · · · · · · · · · · · · ·		

The surface tension measuring device is a Stalagmometer. The specific gravity measuring device is a hygrometer. Both measuring devices are calibrated monthly with deionized water to ensure accuracy.

Work practice standards are followed as recommended by manufacturer: Kocow Co., Chicago, Il

Average plating current is 100amps/sq. ft. Due to varying sizes of parts in plating run, current and plating times are adjusted to accommodate this condition.

Average tank analysis is done every 6 weeks on Hex Chrome and Sulfate content in tanks. Additional analysis is done on proprietary chemical used in the bathe by McGean Rohco at their laboratory facility in Cleveland, Ohio every 3 months, or sooner if indicated by plating difficiencies.

- At the start of each plating cycle, all rectifiers are checked for their level of AC leakage prior to usage so correct plating occurs and unnecessary rework is eliminated.
- Current procedure for surface tension testing is set at 8 hr. operating intervals as required by 40 CFR part 63.342. During prior testing at 4 hr. operating intervals, average fume suppressant, wetting agent additions to meet compliance were 12 hr. intervals of operating time. Our minimum operating time after finishing our compliance standards will be 12 hr. operating time between surface tension tests.
- As yet, we have not had a surface tension test exceed the allowable 45 Dyne limit nor have we noticed any discernible odors in our plating area from the chrome plating tanks. However, if any odor was noticed or a surface tension test exceeded 45 Dynes, we would immediately add at least 8 oz. of fume suppressant in the offending bathe.
- We are currently keeping a detailed log for all chrome plating tanks on surface tension tests and fume suppressant, wetting agent additions.
- This record system has been checked by Margaret Hennis who has not advised us to make any changes.



Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

September 7, 2001

Mr. Robert A. Cogan Accurate Plating & Weaponry, Inc. 940 Harbor Lake Drive Safety Harbor, Florida 34695

Dear Mr. Cogan:

Thank you for your submittal of the Chromium Electroplating and Anodizing Air General Permit Notification Form. The Department received your submittal on August 29.

In reviewing your submittal, it was noted that Accurate Plating and Weaponry, Inc., elected to surrender its existing Title V air general permit (AIRS ID 1030360). If your intention is to continue your dry cleaning operations, then your existing permit is not to be surrendered and the notification form will need to be corrected. To correct the form, please remove the checkmark next to the "I hereby surrender" statement and initial the change, resign the form on the back and date.

Please return the corrected form as quickly as possible to:

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS 5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

If you no longer wish to operate a dry cleaning facility under the Title V air general permit, then your permit may be surrendered. In this case, you need to do nothing and your form will continue to be processed as submitted.

Thank you for your attention to this matter and I apologize for the confusion with this portion of the form.

If you have any questions concerning the form or the corrections, please contact either Rick Butler at 850/921-9586 or me at 850/921-9583.

Sincerely,

Sandra Bowman

Bureau of Air Monitoring

and Mobile Sources

SB/jw Enclosure

cc: Mr. Gary Robbins, Pinellas County "More Protection, Less Process"

Printed on recycled paper.



Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

September 26, 2001

Mr. Robert A. Cogan Accurate Plating & Weaponry, Inc. 940 Harbor Lake Drive Safety Harbor, Florida 34695

Dear Mr. Cogan:

Thank you for your submittal of the Chromium Electroplating and Anodizing Air General Permit Notification Form. The Department received your submittal on August 29.

In reviewing your submittal, it was noted that Accurate Plating & Weaponry, Inc., elected to surrender its existing Title V air general permit (AIRS ID 1030360). If your intention is to continue your dry cleaning operations, then your existing permit is not to be surrendered and the notification form will need to be corrected. To correct the form, please remove the checkmark next to the "I hereby surrender" statement and initial the change, resign the form on the back and date.

Please return the corrected form as quickly as possible to:

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS 5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

If you no longer wish to operate a chromium electroplating and anodizing facility under the Title V air general permit, then your permit may be surrendered. In this case, you need to do nothing and your form will continue to be processed as submitted.

Thank you for your attention to this matter and I apologize for the confusion with this portion of the form.

If you have any questions concerning the form or the corrections, please contact either Rick Butler at 850/921-9586 or me at 850/921-9583.

Sincerely,

Sandra Bowman

Bureau of Air Monitoring and Mobile Sources

SB/jw Enclosure

cc: Mr. Gary Robbins, Pinellas County "More Protection, Less Process"



Jeb Bush Governor

Department of Environmental Protection Twin Towers Office Building 7600 Blair Stone Road Florida 32399-2400

120/0

Mr. Robert A. Cogan Accurate Plating & Weaponry, Inc. 940 Harbor Lake Drive Safety Harbor, Florida 34695

Dear Mr. Cogan:

Thank you for your submittal of the Chromium Electroplating and Anodizing Air General Permit Notification Form. The Department received your submittal on August 29.

In reviewing your submittal, it was noted that M & P Plating, Inc., elected to surrender its existing Title V air general permit (AIRS ID 13003\(\beta\)3). If your intention is to continue your dry cleaning operations, then your existing permit is not to be surrendered and the notification form will need to be corrected. To correct the form, please remove the checkmark next to the "I hereby surrender" statement and initial the change, resign the form on the back and date.

Please return the corrected form as quickly as possible to

General Permits Section Bureau of Air Monitoring and Mobile Sources, MS 5510 Department of Environmental Protection 2600 Blair Stone Road

Tallahassee, Florida 32399-2400-

If you no longer wish to operate a dry cloning facility under the Title V air general permit, then your permit may be surrendered. In this case, you need to do nothing and your form will continue to be processed as submitted.

Thank you for your attention to this matter and I apologize for the confusion with this portion of the form.

If you have any questions concerning the form or the corrections, please contact either Rick Butler at 850/921-9586 or me at 850/921-9583.

Sincerely,

Sandra Bowman

Bureau of Air Monitoring

and Mobile Sources

 $SB/j\widetilde{w} + \ldots + C_{i} = (1, \dots, i) + (1, \dots, i)$

Enclosure

cc: Mr. Gary Robbins, Pinellas County "More Protection, Less Process"



Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

October 8, 2001

Mr. Robert A. Cogan Accurate Plating & Weaponry, Inc. 940 Harbor Lake Drive Safety Harbor, Florida 34695

Dear Mr. Cogan:

Thank you for your submittal of the Chromium Electroplating and Anodizing Air General Permit Notification Form. The Department received your submittal on August 29.

In reviewing your submittal, it was noted that Accurate Plating & Weaponry, Inc., elected to surrender its existing Title V air general permit (AIRS ID 1030360). If your intention is to continue your chromium electroplating and anodizing operations, then your existing permit is not to be surrendered and the notification form will need to be corrected. To correct the form, please remove the checkmark next to the "I hereby surrender" statement and initial the change, resign the form on the back and date.

Please return the corrected form as quickly as possible to:

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS 5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

If you no longer wish to operate a chromium electroplating and anodizing facility under the Title V air general permit, then your permit may be surrendered. In this case, you need to do nothing and your form will continue to be processed as submitted.

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If you have any questions concerning the form or the corrections, please contact either Rick Butler at 850/921-9586 or me at 850/921-9583.

Sincerely,

Sándra Bowman

Bureau of Air Monitoring and Mobile Sources

SB/jw Enclosure

cc: Mr. Gary Robbins, Pinellas County "More Protection, Less Process"

CHROMIUM ELECTROPLATING/ANODIZING

TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION: A	NNUAL		COMPLAINT/DISCOVERY	
RE	E-INSPECTION			-
			/0:00 TIME OUT: _/0:	
FACILITY NAME:	Accurate Pl	ating	,	
FACILITY LOCATION:	940 Harbo	r La	ko Da.	•
· · · · · .	Safety Hav	bor	FL 34695	
RESPONSIBLE OFFICIAL:	Robert Cogan		FL 34695 PHONE: \$13-796-59K	3
CONTACT NAME:			PHONE:	
PART I: NOTIFICATION				
(check appropriate box) 1. New facility notified DARM 3	30 days prior to startup			
2. Facility failed to notify DARN	I to use a general permit			
PART II: CLASSIFICATION				
Facility type(s)/applicable standa	rd indicated on notification	n form:		
Hard Chromium Plating				
a. Existing Large (0.015 mg/ds	cm) 🗆 b. Ex	isting Sm	all (0.03 mg/dscm)	
c. New (0.015 mg/dscm)	(0.	03 mg/dsc	Standard for existing facilities cm) using a rolling average of city (less than 60 million A-hr/year)
Decorative Chromium Plating/	Anodizing		÷	
a. Chromic Acid Bath	Emissions of $\leq 0.01/mg$	/dscm (4.4	4x10 ⁻⁶ gr/dscf)	
	Surface tension of ≤ 45 May only be selected if a wetti	dynes/cming agent is t	(3.1x10 ⁻³ lb-f/ft) (sed.	<u> </u>
b. Trivalent Chromium Bath	With wetting agent			
	Without wetting agent			
c. Chromium Anodizing	Emissions of ≤ 0.01 mg			
	Surface tension of 45 dy May only be selected if a wette	nes/cm (3)	.1x10 ⁻³ lb-f/ft) ised.	

PART	ГШ: (CONTROL TECHNOLOGY			· · · · · · · · · · · · · · · · · · ·			
	ntrol dev selected			In u	se?			
1.		Composite Mesh Pad			□N			
2.		Fiber Bed Mist Eliminator		(□и			
3.		Packed Bed Scrubber		(□N			
4.		Packed Bed Scrubber/Composite Mesh	Pad 🗆	(□N .			
5.		Foam Blanket Fume Suppressant		~	□N .			
6.		Fume Suppressant w/ Wetting Agent	© ?	Č	□N			
Notr	equired	cility conducted an initial performance te for sources using a wetting agent or 1-inch foam b lucked mothed 3068 m. 19	lanket thickn		monitoring parameters?		NC	□N/A
PART	ī īV:	RECORDKEEPING AND REPORTI	NG REQI	JIF	REMENTS			
Has t	he res	ponsible official maintained the follow	ing record	s?				
		-			louises and manitoring			
e	quipm	ly inspection records for add-on air polluent. (applicable only to a facility using a packed mesh pad)					אב	□N/A
I	-	ons and Maintenance Plan (OMP). (applic fiber-bed mist eliminator, or composite mesh pad)	cable only to	a fa	cility using a packed bed	CHY C	אב	□N/A
		nance records for the source, add-on poll ent (equipment identified, date performe				OY C	אב	
		s of date of occurrence, duration, cause, a ction of process, add-on pollution control				0¥ (אב	
5. R	esults	of all performance tests. (306 B)				QY (N	□N/A
ı		s of monitoring data. (not applicable to trivale	ent chromium	bati	hs using a wetting agent)	OY C	ÌΝ	en A
	Mea	mposite Mesh Pad usure the pressure drop across the P daily.		pres	Scrubber sture drop across the PBS and the ly.			
	Mea	per-Bed Mist Eliminator usure the pressure drop across the FBME the upstream device daily.			Scrubber/Composite Me issure drop across the CMP daily.	sh Pad		
	Mea	am Blanket Fume Suppressant usure the foam blanket thickness at the copriate interval.			essant w/ Wetting Agent ace tension at the appropriate inter			
7. P	urchas	se records of wetting agent components.				EY (אב	□N/A
		s of the date and time that fume suppress	sants are ac	de	d to the bath.	OY (N⊑	□N/A
		s of rectifier capacity, if used to determin					ΠC	⊡N/A
10. F	Record	s of the total process operating time.				OY (⊐N	
11. F	Record	s identifying specific periods of excess e	missions.	Ûο	excess arriss.	⊕¥ (□N	
		o, Shutdown & Malfunction Plan				ÐY (אב	

PART V: ADDITIONAL SITE INFORMATION

Accorate Plains uses Lo. Mist by RIN (3/2-384-4522) as a fame Suppressant whatling agent.

although facility has recorded when a 40 hours of operating time has occurred, M1. Cozam has opted to log hours each day of operation - at each tank. The log will also indicate maintenance done. Facility keeps records of lab analysis a inchication of maintenance activities. Mr. Cozam States that Sunface tension is measured more prequently than every 40 hours as required by EP4 mother 3068.

Facility is currently not using tank "C". No odor or fame was observed in plains process area.

Marg	avel	Ũ,	Hennis
	Inspect	tor's	Name
Mago	med 1	ر / ر	Henres

Inspector's Signature

2/23/98

Date of Inspection

2/99

Approximate Date of Next Inspection

TYPE OF INSPECTION:	ANNUAL	COMPLAINT/DISCOVERY	RE-INSPECTION
TIME IN: 10:00	TIME OUT:	10:45 AIRS ID#	1030360
TYPE OF FACILITY:	Chromium Electr	oplating and Anodizing	
FACILITY NAME:	Accurate Platin	g DATE: Febr	ruary 23, 1998
FACILITY LOCATION:	940 Harbor Lake	Drive	
RESPONSIBLE OFFICIA	L: Robert Cogan	PHONE NUM	1BER: 813-796-5943
to be in compliance v	vith DEP Rule 62-213. of the compliance requi	rements evaluated during this inspo 300, Florida Administrative Code (irements evaluated during this insp	(F.A.C.).
COMPLIANCE REQUI	REMENT/PROBLEM	FOLLOW-UP ACT	ION REQUIRED
	-	ysis of the tank solution are bein time and maintenance activities i	_
(I:\USERS\AIRQUAL\WPDOCS\AQ	TOX\CAA\CHROME\03600	198.MVH)	
The Annual Compliance Certificat DATE OF NEXT INSPECTIO		certified and submitted to the inspector.	Yes □ No □
INSPECTION CONDUCTED	BY: Margaret	1. Hennis (Please Print)	
INSPECTOR'S SIGNATURE:	Japan J. Himm	PHONE NUMBER: δι	3-464-4422

Page __fof __f

Revised 10/96

Acc /

AIRS ID#: /030360

CHROMIUM ELECTROPLATING/ANODIZING AIR QUALITY GENERAL PERMIT ANNUAL COMPLIANCE CERTIFICATION FORM

^{*}This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.

Aca

Revised 10/10/96

CHROMIUM ELECTROPLATING/ANODIZING AIR QUALITY GENERAL PERMIT ANNUAL COMPLIANCE CERTIFICATION FORM

FACILITY NAME: Accurate Po FACILITY LOCATION: 940 Hu	ating : Weaponeny	DATE: 5/2	100
FACILITY LOCATION: 940 Ho	sborllake Dr		
Safety	Harbor FL 3K695	Wobil A	
		87	
Annual Reporting Period:Qpril	19 <u>99</u> TO	apal in 51	1900
Based on each term or condition of the Title V 62-213,300, Florida Administrative Code (F.A.			
If NO, complete the following:			
#1. Term or condition of the general permit t	nat has not been in continuous compli	ance during the reporting period stated a	bove:
Exact period of non-compliance: from		to	
Action(s) taken to achieve compliance:	·		
Method used to demonstrate compliance:	<u> </u>		
#2. Term or condition of the general permit t	hat has not been in continuous compli	ance during the reporting period stated a	bove:
Exact period of non-compliance: from _	•	_ to	
Action(s) taken to achieve compliance:			
Method used to demonstrate compliance:			
		· · · · · · · · · · · · · · · · · · ·	
As the responsible official, I hereby certify, be made in this notification are true, accurate an	ased on information and belief formed and complete.	after reasonable inquiry that the statem	ients
RESPONSIBLE OFFICIAL: Name	e (Please Print)	Signature Date	;
6 3\			

^{*}This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.

CHROMIUM ELECTROPLATING/ANODIZING

TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION: A	NNUAL	COMPLAINT/DISCOVERY	
R	E-INSPECTION		
AIRS ID#: 1030360	TIME IN:	3:00 TIME OUT: 45,00	
FACILITY NAME:	Accurate	Plating & Weaponery	· ·
FACILITY LOCATION: _	940 Has	bor cake or,	· ·
_	Safety	3:00 TIME OUT: 1:00 Plating & Deaponery bor Cake Dr. 1 Harbor, 74 34695	
PART I: NOTIFICATION			
(check appropriate box)			
	U 10.6	~	
Facility notified DARM by 9. Now facility notified DARM.		<u> </u>	
2. New facility notified DARM3. Facility failed to notify DARI		•	ı
3. Facility failed to floury DAR	vi to use a general per	mut U	
PART II: CLASSIFICATION			
Facility type(s)/applicable stand	ard indicated on notifi	cation form:	
Hard Chromium Plating			
	` -	714 0 11 600 (1)	
a. Existing Large (0.015 mg/d	•	Existing Small (0.03 mg/dscm)	
c. New (0.015 mg/dscm)	□ d	 Alternative Standard for existing facilities (0.03 mg/dscm) using a rolling average of rectifier capacity (less than 60 million A-hr/year) 	
Decorative Chromium Plating	/Anodizing		
a. Chromic Acid Bath	Emissions of < 0.0	1/mg/dscm (4.4×10 ⁻⁶ gr/dscf)	_ ·
	Surface tension of May only be selected if	\leq 45 dynes/cm (3.1×10 ⁻³ lb-f/ft) a wetting agent is used.	9
b. Trivalent Chromium Bath	With wetting agent		
,	Without wetting ag	ent <0.01mg/dscm (4.4x10 ⁻⁶ gr/dscf)	. .
c. Chromium Anodizing	Emissions of <0.01	mg/dscm (4.4x10 ⁻⁶ gr/dscf)	
	Surface tension of a May only be selected if a	45 dynes/cm (3.1x10 ⁻³ lb-f/ft) a wetting agent is used.	

1440 x Spec Granty

PART III: CONTR	OL TECHNOLOGY		•		
Control device selected		T_	use?		
	site Mesh Pad		□N .		
2. 🗆 Fiber B	ed Mist Eliminator	. □Y	□N		
3. 🗆 Packed	Bed Scrubber	ΩY	ON		
4. 🗆 Packed	Bed Scrubber/Composite Mesh	Pad 🗆 Y	ПИ	:	
5. 🗆 Foam B	lanket Fume Suppressant	ΩY	ПИ		
6. 🗆 Fume S	uppressant w/ Wetting Agent	ΩY	□N		
	ducted an initial performance te s using a wetting agent or 1-Inch foam b			OY ON	©N/A
				<u>. · ·</u>	
PART IV: RECOR	DKEEPING AND REPORTI	NG REQUI	REMENTS		
Has the responsible	official maintained the followi	ing records	?		
	ction records for add-on air pollulicable only to a facility using a packed		_	оу ом	ØN/A
· ·	Maintenance Plan (OMP). (applio	cable orly to a	facility using a packed had		
-	vist eliminator, or composite mesh pad)	table only to a	denity using a packed bed	OY ON	DN/A
	cords for the source, add-on pollopment identified, date performent		-	oy on	
	of occurrence, duration, cause, a process, add-on pollution control			OY ON	
5. Results of all pc	rformance tests.			OY ON	ØN/A
6. Records of moni	toring data. (not applicable to trivale	nt chromium b	aths using a wetting agent)	OY ON	DN7A
Composite Measure the pr CMP daily.	Mesh Pad essure drop across the		d Scrubber ressure drop across the PBS and the laily.		•
	Mist Eliminator essure drop across the FBME m device daily.		d Scrubber/Composite Moressure drop across the CMP daily.	esh Pad	
	ket Fume Suppressant am blanket thickness at the erval.		pressant w/ Wetting Agen urface tension at the appropriate inte		
7. Purchase record	s of wetting agent components.			DY □N	□N/A
8. Records of the d	late and time that fume suppress	ants are add	led to the bath.	DY ON	□N/A
9. Records of recti	fier capacity, if used to determin	e facility siz	ze.	DY DN	ØN/A
10. Records of the	total process operating time.			DY ON	
11. Records identif	ying specific periods of excess e	missions.		OY ON	
12. Startun Shutdo	own & Malfunction Plan			OY ON	

Revised 10/9/96

PART V: ADDITIONAL S	ITE INFORMATION	:

Name of Responsible Official

Margareh J. Hannis

Inspector's Name

Inspector's Signature

Date of Inspection

Approximate Date of Next Inspection

TYPE OF INSPECTION: ANNUAL [9-	COMPLAINT/DISCOVERY RE-INSPECTION
TIME IN: タ;oo TIME OU	T: 4:00 AIRS ID# 1030360
TYPE OF FACILITY: Chromium Elect	roplating and Anodizing
FACILITY NAME: Accurate Platin	ng and Weaponery DATE: Ұ/ແ/ຈວ
FACILITY LOCATION: 940 Harbor Lak	e Drive
RESPONSIBLE OFFICIAL: Safety Harbor	PHONE NUMBER: 727-796-5943
to be in compliance with DEP Rule 62-213	nirements evaluated during this inspection, the facility is found 3.300, Florida Administrative Code (F.A.C.). Lirements evaluated during this inspection, the following FOLLOW-UP ACTION REQUIRED
Initial performance test has not been performed and monitoring parameters have not been established.	Conduct an initial performance test. Monitor operating conditions during test. The operating conditions will establish parameters that will be used to demonstrate continuing compliance with the emissions limit.
Did not maintain purchase records of wetting agent components.	Maintain records of purchases so that they can be made available during an inspection.
Did not have an O&M plan, or a start-up, shutdown, malfunction (SSM) plan, in place.	If no specific procedures are available from the manufacturer, develop an O&M plan, for normal operations and a SSM plan describing procedures for maintaining and operating equipment during periods of start-up and shutdown associated with a malfunction.
Did not have start-up, shutdown, malfunction plan associated with their O&M plan.	Develop and implement a start-up, shutdown, malfunction plan to accompany the O&M plan.
Did not maintain records of the dates and times that fume suppressants are added to the bath.	Develop and maintain a log that records the date and time that fume suppressants are added to the bath.
Did not maintain records of actual cumulative rectifier capacity (small hard chrome), which is being used to determine facility size.	Develop and maintain a log that records actual cumulative rectifier capacity.
The Annual Compliance Certification form has been proper DATE OF NEXT INSPECTION: 4/01/03 INSPECTION CONDUCTED BY: Mare and INSPECTOR'S SIGNATURE: Mare and Ox	(Approximate)
INSPECTOR'S SIGNATURE: Who goed Ox	FULL PHONE NUMBER: 464-4422

Page <u>/</u> of <u>3</u>

Revised 10/96

TYPE OF INSPECTION: ANNUAL 🖃	COMPLAINT/DISCOVE	RY 🗆	RE-INSPECTION []
TIME IN: 3:03 TIME OU	JT: 4:00	AIRS ID#	1030360
TYPE OF FACILITY: Chromium Elec	troplating and Anodiz	ing	
FACILITY NAME: Accurate Platin	ng and Weaponery		DATE: 4/1/30
FACILITY LOCATION: 940 Harbor Lal	ke Drive		·
RESPONSIBLE OFFICIAL: Safety Harbor	PHO	ONE NUMBEI	R: 727-796-5943
Based of the results of the compliance requirements to be in compliance with DEP Rule 62-213 Based on the results of the compliance requirements are compliance discrepancies were noted:	3.300, Florida Administra	tive Code (F.A	C.).
Did not maintain records of the total process operating time.	Develop and maintain a operating time (actual ta	-	Is the total process
Did not maintain records identifying specific periods of excess emissions.	Develop and maintain a commencement and coremissions (as determine during malfunction of the control equipment, or maintain and control equipment.	npletion of eaced from monitone process, add	h period of excess ring data) that occurs on air pollution
Quarterly inspection records for add-on air pollution control devices and monitoring equipment were not maintained.	Develop and maintain a inspections of the add-o monitoring equipment a work practice procedure	n pollution cor s defined by th	itrol devices and
Did not maintain records of maintenance performed, add-on pollution control devices, and monitoring equipment.	Develop and maintain a performed on the affect control device, and mor identified, date perform performed) as established	ed source, the a nitoring equipmed, and descrip	add-on air pollution nent (equipment tion of maintenance
Did not record the date of occurrence, duration and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment.	Develop and maintain a occurrences, durations a malfunction of process, monitoring equipment.	and causes (if k	nown) of each
The Annual Compliance Certification form has been proper DATE OF NEXT INSPECTION:	*	_	Yes □ No □
INSPECTION CONDUCTED BY:	(Please Prim		
INCORCTOD'S SIGNATUDE.	DIIONE NII		

TYPE OF INSPECTION:	ANNUAL 🗹	COMPLAINT/DISC	OVERY 🗆	RE-INSPE	CTION 🗆
TIME IN: 3:00	TIME OU	T: 4:00	AIRS ID#	1030360)
TYPE OF FACILITY:	Chromium Elect	roplating and An	odizing		
FACILITY NAME:	Accurate Platin	ng and Weaponer	у	DATI	E: 4/1/po
FACILITY LOCATION:	940 Harbor Lak	e Drive			
RESPONSIBLE OFFICIAL:	Safety Harbor	· 	PHONE NUMBE	ER: 727	796-5943
Based of the results of to be in compliance with Based on the results of compliance discrepance	th DEP Rule 62-213 the compliance requ	.300, Florida Admir	nistrative Code (F.	A.C.).	·
Did not record actions taken of malfunction when such action with the O&M plan.		Develop and maint during periods of n inconsistent with the	nalfunction when s		
(F:\USERS\AIRQUAL\WPDC	OCS\AQTOX\CAA\	CHROME\SUMM <i>A</i>	ARY2.FRM)		
					·
The Annual Compliance Certification DATE OF NEXT INSPECTION			d to the inspector.	Yes □	No □
INSPECTION CONDUCTED B	Y:		use Print)		
INSPECTOR'S SIGNATURE:_		·	E NUMBER:		

Tank A 9/10/99 = 40 dyres/am

Practed 40 kes or 12/1/99

Atrid not read Sing, tension with 4/2/00

Afres before next reading on 4/3/00

42.5.

TANKB. 7/11/98 40 dyes 9/10/99 42 dyes

Tank C Not in use

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8	Restricted Delivery Fee (Endorsement Required)		-1	*	2
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	St: ACCURATE PI	ATING & WEAP	ONRY INC		7
700	940 HARBOR I CH SAFETY HARE	AKE DR		<u></u>	3
<u>{</u>	PS	·		Instructio	ns ,

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY			
 Complete items 1, 2, and 3Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: 	A. Received by (Please Print Clearly) C. Signature X Agent Addressee D. Is delivery address different from item 1? Yes If YES, enter delivery address below: No			
ROBERT A COGAN ACCURATE PLATING & WEAPONRY INC 940 HARBOR LAKE DR SAFETY HARBOR FL 34695	3. Service Type □ Certified Mail □ Express Mail □ Registered □ Return Receipt for Merchandise □ Insured Mail □ C.O.D. 4. Restricted Delivery? (Extra Fee) □ Yes			
2. Article Number (Copy from service label) 7000 0520 0020 9372 9958				
PS Form 3811, July 1999 Domestic Ret				

. , Z ,333 613 225

US Postal Service Receipt for Certified Mail

ACCURATE PLATING & WEAPONRY INC ROBERT A COGAN 940 HARRON I 940 HARBOR LAKE DR SAFETY HARBOR FL 34695

	Postage	\$
	Certified Fee	
	Special Delivery Fee	
10	Restricted Delivery Fee	
April 1995	Return Receipt Showing to Whom & Date Delivered	
	Return Receipt Showing to Whom, Date, & Addressee's Address	_
800	TOTAL Postage & Fees	\$
PS Form 3800, April 1995	Postmark or Date	

SENDER: Complete items 1 and/or 2 for additional services. Complete items 3, 4a, and 4b. Print your name and address on the reverse of this form so the card to you.	I also wish to receive the following services (for an extra fee):		
 Attach this form to the front of the mailpiece, or on the back i permit. Write "Return-Receipt Requested" on the mailpiece below the The Return Receipt will show to whom the article was delivered. 	Addressee's Address Restricted Delivery Consult postmaster for fee.		
3. Article Addressed to: AIRS ID 1030360 ACCURATE PLATING & WEAPONRY INC ROBERT A COGAN 940 HARBOR LAKE DR SAFETY HARBOR FL 34695	4b. Service Register Express	Type ed Mail eceipt for Merchandis	☐ Certifie
5. Received By: (Print Name)	8. Addresse and fee is	e's Address (Only s paid)	if requested



THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

TOTAL AMOUNT DUE: \$50.00

303447

Do NOT Remove Label

AIRS ID#1030360

ACCURATE PLATING & WEAPONRY INC ROBERT A COGAN 940 HARBOR LAKE DR SAFETY HARBOR FL 34695

FOR GOVERNMENT USE ONLY Org.: 37550101000 EO: B1 Fund: 20-2-035001 Оыј.: 002273

THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

0390357

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

TOTAL AMOUNT DUE: \$50.00

Do NOT Remove Label

AIRS ID # 1030360

ROBERT A COGAN ROBERT A COGAN 940 HARBOR LAKE DR SAFETY HARBOR FL 34695 FOR GOVERNMENT USE ONLY

Org.: 37550101000 EO: B1

Fund: 20-2-035001

Obj.: 002273

This portion must be attached to remittance for proper handling $0359151 \sim$

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

RECEIVED MAIL ROOM

TOTAL AMOUNT DUE: \$50.00-2 99

Do NOT Remove Label

AIRS ID # 1030360

ROBERT A COGAN ROBERT A COGAN 940 HARBOR LAKE DR SAFETY HARBOR FL 34695

50

FOR GOVERNMENT USE ONLY

Org.: 37550101000 EO: B1 Fund: 20-2-035001

Obj.: 002273

THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

JAN 24 97

TOTAL AMOUNT DUE: \$50.00

Do NOT Remove Label

AIRS ID# 1030360 **ACCURATE PLATING & WEAPONRY INC ROBERT A COGAN**

940 HARBOR LAKE DR SAFETY HARBOR FL 34695 FOR GOVERNMENT USE ONLY

Org.: 37550101000 EO: B1

Fund: 20-2-035001 Оы.: 002273



THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

420499 DEC112002

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

TOTAL AMOUNT DUE: \$50.00

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AIRS ID#1030360

ACCURATE PLATING & WEAPONRY INC ROBERT A COGAN 940 HARBOR LAKE DR SAFETY HARBOR FL 34695

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FOR GOVERNMENT SE ONLY

Org.: 37550101000 EO: A1 Fund: 20-2-035001

Obj.: 002273

This portion must be attached to remittance for proper handling 401035

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

TOTAL AMOUNT DUE: \$50.00 Bureau of a Mobi

5-251

Do NOT Remove Label

AIRS ID # 1030360

ACCURATE PLATING & WEAPONRY INC ROBERT A COGAN 940 HARBOR LAKE DR SAFETY HARBOR FL 34695

70 OPg. 537550101000 EO: Fund 20-2-035001 Obi. 9002273 12-27-00 pd

AIRS ID#: //30360

Revised 01/13/98

CHROMIUM ELECTROPLATING/ANODIZING AIR QUALITY GENERAL PERMIT

ANNUAL COMPLIANCE CERTIFICATION FORM

AIRS ID#1030360
ACCURATE PLATING & WEAPONRY INC
ROBERT A COGAN
940 HARBOR LAKE DR
SAFETY HARBOR FL 34695

Bureau of Air Monitoring
& Mobile Sources

	<u> </u>	& Moi	Mobile Sources	
	Do	NOT Remove Label	•	
Annual Reporting Period:	1-1-97	19 <u><i>92</i></u> TO	1-1-	19_ 98
	ndition of the Title V general air	-		_
62-213.300, Florida Admi	inistrative Code (F.A.C.), during	g the period covered by thi	is statement. YES	□NO
If NO, complete the follow	ving:		•	
#1. Term or condition of t	the general permit that has not	been in continuous compli	iance during the reporting	period stated above:
Exact period of non-compl	liance: from		to	
Action(s) taken to achieve	compliance:			
Method used to demonstra	ate compliance:			
#2. Term or condition of t	the general permit that has not	been in continuous compli	iance during the reporting	period stated above:
Exact period of non-compl	liance: from		_ to	·
Exact period of non-compl Action(s) taken to achieve			_	·
Exact period of non-compl Action(s) taken to achieve Method used to demonstra	compliance:		_	

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