MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Tobin Tool & Design Co., LLC
1004 W. Washington St.,
Shelbyville, Indiana 46176

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 145-12108-00029	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
A.2 Emission Units and Pollution Control Equipment Summary
A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONSTRUCTION CONDITIONS 6
B.1 Permit No Defense [IC 13]
B.2 Definitions
B.3 Effective Date of the Permit [IC 13-15-5-3]
B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]
B.5 Modification to Permit [326 IAC 2]
B.6 Minor Source Operating Permit [326 IAC 2-6.1]

C SOURCE OPERATION CONDITIONS 8
C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]
C.2 Preventive Maintenance Plan [326 IAC 1-6-3]
C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
C.4 Inspection and Entry [326 IAC 2-7-6(2)]
C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
C.6 Permit Revocation [326 IAC 2-1-9]
C.7 Opacity [326 IAC 5-1]
C.8 Fugitive Dust Emissions [326 IAC 6-4]

Testing Requirements
C.9 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

Compliance Monitoring Requirements
C.10 Compliance Monitoring [326 IAC 2-1.1-11]
C.11 Monitoring Methods [326 IAC 3]

Record Keeping and Reporting Requirements
C.12 Malfunctions Report [326 IAC 1-6-2]
C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-3]
C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]
C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

D.1 Emissions unit OPERATION CONDITIONS -Hard Chrome Tank T3 15

Emission Limitations and Standards
D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]
D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]
D.1.3 Chromium Emissions Limitation [326 IAC 20-8-1][40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]
D.1.4 Work Practice Standards [326 IAC 20-8-1][40 CFR 63.342(f)]
D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]
D.1.6 Operation and Maintenance Plan [326 IAC 20-8-1][40 CFR 63.342(f)(3)]

Compliance Determination Requirements
D.1.7 Performance Testing [326 IAC 20-8-1][326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

Compliance Monitoring Requirements
D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 20-8-1][326 IAC 2-6.1-5(a)(2)] [40 CFR 63.343(c)]

Record Keeping and Reporting Requirements
D.1.9 Record Keeping Requirements [326 IAC 20-8-1][40 CFR 63.346]
D.1.10 Reporting Requirements [326 IAC 20-8-1][326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

D.2 Emissions unit OPERATION CONDITIONS - Welding and Blasting **22**

Emission Limitations and Standards
D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Compliance Determination Requirements
D.2.2 Testing Requirements [326 IAC 2-1.1-11]
D.2.3 Particulate Matter (PM)

Annual Notification **23**
Malfunction Report **24**
Ongoing Compliance Status Report **26**

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary Hard Chromium Electroplating manufacturing facility.

Authorized Individual:	Tobin Tool & Design, LLC
Source Address:	1004 W. Washington St., Shelbyville, Indiana 46176
Mailing Address:	1004 W. Washington St., Shelbyville, Indiana 46176
Phone Number:	(317) 392 0847
SIC Code:	3471
County Location:	Shelby
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(1) one (1) Hard Chromium Electroplating Operation with a maximum cumulative potential rectifier capacity of 11,760,000 Ampere-hours (A-hr) per year consisting of:

(a) one (1) hard chromium electroplating tank, identified as T3, equipped with a composite mesh pad system for control, exhausting to one (1) stack, identified as S1;

(2) welding operation; one (1) metal inert gas (MIG) station, with a maximum wire consumption rate of 0.0023 pounds of wire per hour (lb wire/hr), one (1) tungsten inert gas (TIG) station, with a maximum wire consumption rate of 0.0023 lb wire/hr, and one (1) stick welding station, with a maximum wire consumption rate of 0.0057 lb wire/hr;

(3) one (1) pneumatic blaster, identified as Torit 80, blasting either Glass bead or Aluminum Oxide or Silica carbide media with a maximum rate of 391 lbs/hr, using a baghouse as control, and exhausting inside the building;

(4) one (1) alkaline stripping tank, identified as T2, exhausting to the single mesh pad mist eliminator;

(5) one (1) alkaline rinse tank, identified as T1, exhausting inside the building; and

(6) three (3) chrome rinse tanks, identified as T4, exhausting inside the building.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a minor source, as defined in 326 IAC 2-7-1(22);

(b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

(c) It is not a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

(c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a

notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(1) One (1) Hard Chromium Electroplating Operation with a maximum cumulative potential rectifier capacity of 11,760,000 Ampere-hours (A-hr) per year consisting of:
(a) One (1) hard chromium electroplating tank, identified as T3, equipped with a composite mesh pad system for control, exhausting to one (1) stack, identified as S1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N. The permittee shall comply with the requirements of this condition on and after the compliance date for the tank T3.

D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tank T3. A copy of this rule is attached. The permittee shall comply with the requirements of this condition on and after the compliance date for the tank.

D.1.3 Chromium Emissions Limitation [326 IAC 20-8-1][40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

(a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.

(b) The hard chromium electroplating tank, identified as T3 above, is considered a small, existing hard chromium electroplating operation. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the hard chromium electroplating tank by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.03 mg/dscm [1.3×10^{-5} gr/dscf].

D.1.4 Work Practice Standards [326 IAC 20-8-1][40 CFR 63.342(f)]

The following work practice standards apply to tank T3:

(a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tank T3, including the composite mesh pad system and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.

(b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.

(c) These operation and maintenance requirements are enforceable independent of

emissions limitations or other requirements in this section.

(d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.

(e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAM may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAM finds that the plan:

(1) Does not address a malfunction or period of excess emissions that has occurred;

(2) Fails to provide for the operation of tank T3, or the triple mesh pad mist eliminator and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or

(3) Does not provide adequate procedures for correcting malfunctioning process equipment, monitoring equipment or other causes of excess emissions as quickly as practicable.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with Section B-Preventive Maintenance Plan, of this permit, is required for the tank T3 and the triple mesh pad mist eliminator.

D.1.6 Operation and Maintenance Plan [326 IAC 20-8-1][40 CFR 63.342(f)(3)]

(a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tank T3. The OMP shall specify the operation and maintenance criteria for the tank, the composite mesh pad system and monitoring equipment and shall include the following elements:

(1) For the composite mesh-pad system (CMP):

(A) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.

(B) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.

(C) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.

(D) Perform washdown of the composite mesh-pads in accordance with manufacturers recommendations.

(2) A standardized checklist to document the operation and maintenance criteria for tank T3, the composite mesh-pad system, and the monitoring equipment.

(3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess

emissions as indicated by monitoring data do not occur.

(4) A systematic procedure for identifying malfunctions and periods of excess emissions of tank T3, the composite mesh-pad system, and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.

(b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).

(c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tank T3, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.

(d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.

(e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of tank T3 or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 20-8-1][326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

(a) A performance test demonstrating initial compliance for tank T3 was performed on July 10, 1996.

During the initial performance test, it was determined that the average pressure drop across the composite mesh pad system was 9.0 ± 1.0 inches of water and the average outlet chromium concentration is 0.00629 mg/dscm.

(b) The Permittee is not required to further test tank T3 by this permit. However, the IDEM may require testing when necessary to determine if the tank is in compliance. If testing is required by the IDEM, compliance with the limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and

Section C - Performance Testing.

(c) Any change, modification, or reconstruction of the tank T3, the triple mesh pad mist eliminator or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 20-8-1][326 IAC 2-6.1-5(a)(2)] [40 CFR 63.343(c)]

(a) Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.1.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that the hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.

(b) Tank operation or operating time is defined as that time when a part is in the tank and the rectifier is turned on. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) may be less than fifteen minutes, that time between plating the two parts is considered operating time.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements [326 IAC 20-8-1][40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

(a) Inspection records for the composite mesh-pad system and monitoring equipment to document that the inspection and maintenance required by Conditions D.1.7 and D.1.9 have taken place. The record can take the form of a checklist and should identify the following:

(1) The device inspected;

(2) The date of inspection;

(3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and

(4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.

(b) Records of all maintenance performed on tank T3, the triple mesh pad mist eliminator and monitoring equipment.

(c) Records of the occurrence, duration, and cause (if known) of each malfunction of tank T3, the composite mesh-pad system and monitoring equipment.

(d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tank T3, the composite mesh-pad system and monitoring equipment as indicated by monitoring data collected in accordance with this condition.

(e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.

(f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.

(g) Test reports documenting results of all performance tests.

(h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.

(i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.

(j) The total process operating time, as defined in Condition D.1.9(b), of tank T3, during the reporting period.

(k) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.11.

D.1.10 Reporting Requirements [326 IAC 20-8-1][326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

The notifications and reports required in this section shall be submitted to IDEM, OAM using the address specified in Section C - General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications
The Permittee shall notify IDEM, OAM in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAM, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tank T3 shall be submitted to IDEM, OAM no later than forty-five (45) days following completion of the compliance demonstration pursuant to Section C - Performance Testing.

(3) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or

Reconstruction (NCR) to IDEM, OAM. In addition, the Permittee may not change, modify, or reconstruct tank T3 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tank T3 serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAM before construction, modification, or reconstruction may commence.

(b) Performance Test Results
The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.

(c) Ongoing Compliance Status Report
The Permittee shall prepare summary reports to document the ongoing compliance status of tank T3 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tank T3 is located at site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAM upon request.

(1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).

(A) The first report shall cover the period from the issuance date of this permit to December 31 of the year in which the permit is issued.

(B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.

(2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAM:

(A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.9(b) for the reporting period; or

(B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.9(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

(3) IDEM, OAM may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

(1) Welding operation; one (1) metal inert gas (MIG) station, with a maximum wire consumption rate of 0.0023 pounds of wire per hour (lb wire/hr), one (1) tungsten inert gas (TIG) station, with a maximum wire consumption rate of 0.0023 lb wire/hr, and one (1) stick welding station, with a maximum wire consumption rate of 0.0057 lb wire/hr;

(2) One (1) pneumatic blaster, identified as Torit 80, blasting either Glass bead or Aluminum Oxide or Silica carbide media with a maximum rate of 391 lbs/hr, using a baghouse as control, and exhausting inside the building.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the welding operation not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate emissions from the pneumatic blasting operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

$E = 4.10\ (0.1956)^{0.67} = 1.37$ lbs PM/hr

Therefore, the pneumatic blasting operation is limited to 1.37 lbs PM/hr

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D***.x.x*** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The Dust collector cabinet for PM control shall be in operation at all times when the pneumatic blaster is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Tobin Tool & Design Co., LLC**
Address:	**1004 W. Washington St., Shelbyville, IN 46176**
City:	**Shelbyville**
Phone #:	**317 392 1347**
MSOP #:	**145-12108-00029**

I hereby certify that **[source]** is **9** still in operation.
9 no longer in operation.

I hereby certify that **[source]** is **9** in compliance with the requirements of MSOP 145-12108-00029.
9 not in compliance with the requirements of MSOP 145-12108-00029.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____ _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT

Source Name: Tobin Tool & Design
Source Address: 1004 W. Washington St., Shelbyville, IN 46176
Mailing Address: 1004 W. Washington St., Shelbyville, IN 46176
MSOP Permit No.: 145-12108-00029

Tank ID #: T3
Type of process: Hard
Monitoring Parameter:
Parameter Value:
Limits: Total chromium concentration may not exceed 0.03 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
The frequency for completing this report may be altered by the IDEM, OAM, Compliance Branch.

Companies classified as a major source: submit this report no later than 30 days after the end of the reporting period.
Companies classified as an area source: complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

This form consists of 2 pages **Page 1 of 2**

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE	
9	NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
9	THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:
DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:
ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE	
9	I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.
9	THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Tobin Tool & Design, LLC
Source Location:	1004 W. Washington St., Shelbyville, IN 46176
County:	Shelby
SIC Code:	3471
Operation Permit No.:	145-12108-00029
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Management (OAM) has reviewed an application from Tobin Tool & Design, LLC relating to the operation of a Hard Chromium Electroplating manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) one (1) Hard Chromium Electroplating Operation with a maximum cumulative potential rectifier capacity of 11,760,000 Ampere-hours (A-hr) per year consisting of:

(a) one (1) hard chromium electroplating tank, identified as T3, equipped with a composite mesh-pad system for control, exhausting to one (1) stack, identified as S1;

(2) welding operation; one (1) metal inert gas (MIG) station, with a maximum wire consumption rate of 0.0023 pounds of wire per hour (lb wire/hr), one (1) tungsten inert gas (TIG) station, with a maximum wire consumption rate of 0.0023 lb wire/hr, and one (1) stick welding station, with a maximum wire consumption rate of 0.0057 lb wire/hr;

(3) one (1) pneumatic blaster, identified as Torit 80, blasting either Glass bead or Aluminum Oxide or Silica carbide media with a maximum rate of 391 lbs/hr, using a baghouse as control, and exhausting inside the building;

(4) one (1) alkaline stripping tank, identified as T2, exhausting to the single mesh pad mist eliminator;

(5) one (1) alkaline rinse tank, identified as T1, exhausting inside the building; and

(6) three (3) chrome rinse tanks, identified as T4, exhausting inside the building.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Exemption CP# 145-3307, issued on April 14, 2000.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
S1	Chromium Electroplating	13	1.25	3927	78

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 29, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 3).

Chromium emissions (Single HAP) from the biggest source in Indiana is less than (10) tons per year and Tobin Tool & Design, LLC is a much smaller source in comparison. So no chromium emissions calculations were necessary for this source because the emissions from this source will be less than ten (10) tons per year.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	68.56
PM-10	68.56
SO_2	0.00
VOC	0.00
CO	0.00
NO_x	0.00

HAP's	Potential To Emit (tons/year)
Chromium Compounds	Less Than 10
Manganese Compounds	Less Than 10
TOTAL	Less Than 25

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) This existing source is subject to 326 IAC 20-8 but not subject to 326 IAC 2-5.5-1 (b)(2) (registration) because the source consists of only hard chromium (not decorative chromium) electroplating tanks and the source emits less than major source levels (see statement (a) above). Therefore, the source is subject to the provisions of 326 IAC 2-6.1-3(a).

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Shelby County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Shelby County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Shelby County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.69
PM10	0.69
SO_2	0.00
VOC	0.00
CO	0.00
NO_x	0.00
Single HAP	<10.0 each HAP
Combination HAPs	<25.0

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

Although this source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N), no Title V permit is required pursuant to 40 CFR 63.340(e).

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) Tank T3 is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:

(1) Emission limitation:
The permittee shall comply with the requirements of this condition on and after the compliance date for the tanks.

(a) The hard chromium electroplating tank, identified as T3 above is considered a small, existing hard chromium electroplating operation. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the tank by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed fifteen-thousandth milligrams of total chromium per dry standard cubic meter of ventilation air (0.015 mg/dscm) [equivalent to six and six-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (6.6×10^{-6} gr/dscf)].

(2) Monitoring Requirements:
The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.

Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must avert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.

An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.

(3) Reporting Requirements:
A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Management
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206

(4) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)
This source is located in Shelby County and the potential to emit any criteria pollutant is less than one hundered (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the welding operation not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) The particulate matter (PM) from the one (1) pneumatic blaster shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

$E = 4.10\ (0.1956\ TPH)^{0.67} = 1.37$ lbs PM/hr

Based on the above equation, particulate matter emissions from the pneumatic blasters shall be limited to 1.37 pounds per hour.

Compliance calculation:
(68.56 tons PM/yr) * (yr/8,760 hrs) * (2,000 lbs/ton) = 15.65 lbs PM/hr

Controlled Compliance calculation:
(0.69 tons PM/yr) * (yr/8,760 hrs) * (2,000 lbs/ton) = 0.15 lbs PM/hr

The pneumatic blasters will comply with the requirements of 326 IAC 6-3-2 by using a baghouse.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The composite mesh-pad system has applicable compliance monitoring conditions as specified below:

(a) Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.1.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that the hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.

These monitoring conditions are necessary because the composite mesh-pad system for the chromium electroplating process must operate properly to ensure compliance with 40 CFR 63.343(c)(1)(ii) and 326 IAC 2-6.1-5(a)(2).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this hard chromium electroplating manufacturing facility shall be subject to the conditions of the attached proposed **Minor Source Operating Permit 145-12108-00029.**

Appendix A: Emission Calculations
Abrasive Blasting - Confined

Company Name: Tobin Tool & Design Co., LLC
Address City IN Zip: 1004 W. Washington St., Shelbyville, IN 46176
CP: 145-12108
Plt ID: 145-00029
Reviewer: Adeel Yousuf/EVP
Date: 07/20/2000

Table 1 - Emission Factors for Abrasives

	Emission Factor	
Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al Oxide	106
Sand	99
Glass bead	90

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

	Nozzle Pressure (psig)							
Internal diame	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)	
FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =	365.5
D = Density of abrasive (lb/ft3) (Aluminum)	106
D1 = Density of sand (lb/ft3) =	99
ID = Actual nozzle internal diameter (in) =	0.3125
ID1 = Nozzle internal diameter (in) from Table 3 =	0.3125

Flow Rate (FR) (lb/hr) = **391.343** per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =	0.010	
FR = Flow Rate (lb/hr) =	391.343	
w = fraction of time of wet blasting =	0	%
N = number of nozzles =	4	

Uncontrolled Emissions =	**15.65 lb/hr**	
	68.56 ton/yr	
Controlled Emissions =	**0.69 ton/yr**	99% effeciency

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
E = EF x FR x (1-w/200) x N
w should be entered in as a whole number (if w is 50%, enter 50)

Appendix A: Emission Calculations

Company Name: Tobin Tool & Design Co., LLC
Address City IN Zip: 1004 W. Washington St., Shelbyville, IN 46176
CP: 145-12108
Plt ID: 145-00029
Reviewer: Adeel Yousuf / EVP

Uncontrolled Potential Emissions (tons/year)

Pollutant	Emissions Generating Activity: Welding Operation	Pneumatic Blasting	**TOTAL**
PM	1.03E-03	68.56	68.56
PM10	1.03E-03	68.56	68.56
SO2	0.00	0.00	0.00
NOx	0.00	0.00	0.00
VOC	0.00	0.00	0.00
CO	0.00	0.00	0.00
total HAPs	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Pollutant	Emissions Generating Activity: Welding Operation	Pneumatic Blasting	**TOTAL**
PM	1.03E-03	0.69	0.69
PM10	1.03E-03	0.69	0.69
SO2	0.00	0.00	0.00
NOx	0.00	0.00	0.00
VOC	0.00	0.00	0.00
CO	0.00	0.00	0.00
total HAPs	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Welding and Thermal Cutting

Company Name: **Tobin Tool & Design Co., LLC**
Address City IN Zip: **1004 W. Washington St., Shelbyville, IN 46176**
Permit No./Plt ID: **145-12108-00029**
Reviewer: Adeel Yousuf
Date: June 20, 2000

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)	1	0.00228		0.0055	0.0005			1.25E-05	1.14E-06	0.000	0.000	1.14E-06
Stick	1	0.0057		0.037	0.003			2.11E-04	1.71E-05	0.000	0.000	1.71E-05
Tungsten Inert Gas (TIG)(carbon steel)	1	0.00228		0.0055	0.0005			1.25E-05	1.14E-06	0.000	0.000	1.14E-06
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								2.36E-04	1.94E-05	0.00	0.00	1.94E-05
Potential Emissions lbs/day								5.66E-03	4.65E-04	0.00	0.00	4.65E-04
Potential Emissions tons/year								1.03E-03	8.49E-05	0.00	0.00	8.49E-05

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).
Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.