March 1, 2002

Mr. J. Michael Raymond
R&S Plating, Inc.
2302 Bloyd Ave.
Indianapolis, IN. 46218

Re: 097-15469-00325
Second Notice Only to
MSOP 097-11695-00325

Dear Mr. Raymond:

R&S Plating Inc. was issued a permit on September 5, 2000 for a hard chromium electroplating operation. On September 9, 2001 R&S Plating Inc. was issued Administrative Amendment 097-14505-00325 which will remain unchanged in content but which will now be referred to as First Notice Only 097-14505-00325. A letter requesting a second revision to MSOP 097-11695-00325 was received on January 24, 2002. Since this revision request pertains to typographical errors incorporated within the First Notice Only 097-14505-00325, then pursuant to the provisions of 326 IAC 2-6.1-6(d)(2) the permit is hereby revised as follows:

1. The following sections of the permit have been revised to include the phrases “mesh pad system and composite mesh pad system” These phrases were previously included in MSOP 097-11695–00325 but incorrectly excluded in First Notice Only 097-14505-00325. Furthermore, the following correction has also been included: Section D.1.7(a) was changed to include the original average pressure drops from MSOP 097-11695-00325 as 3.0+/-1 inches of water for HC #1 and 4.5 +/-1 inches of water for HC #2, since First Notice Only 097-14505-00325 listed incorrect pressure drops for HC#1 and HC #2. The corrections are addressed in bold face and the deletions addressed in strikeout. These sections are hereby revised as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 17,640,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #1, equipped with a packed-bed scrubber/**mesh pad system as controls, equipped with a** composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

(b) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 23,520,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #2, equipped with a packed-bed scrubber/**mesh pad system as controls, equipped with a** composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Chromium Electroplating Operations
The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

(a) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 17,640,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #1, equipped with a packed-bed scrubber/**composite mesh-pad system as controls, equipped with a** composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

(b) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 23,520,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #2, equipped with a packed-bed scrubber/**composite mesh-pad system as controls, equipped with a** composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

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

The following work practice standards apply to tanks HC #1 and HC #2:

(a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks HC #1 and HC #2, including the packed-bed scrubber/**composite mesh-pad system** , and composite mesh-pad, and monitoring equipment, in a manner consistent with good air

(e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ and OES may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAQ and OES 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 tanks HC #1 and HC #2, the packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad***,*** 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 malfunction process equipment, packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad, 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 tanks HC #1 and HC #2 and the packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad.

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

(a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks HC #1 and HC #2. The OMP shall

specify the operation and maintenance criteria for the tanks, the packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad and monitoring equipment and shall include the following elements:

(1) For the packed-bed scrubber/composite mesh-pad system (PBS/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 tanks HC #1 and HC #2, the air pollution control technique, packed-bed scrubber/**composite mesh-pad system**, composite mesh-pad, and the monitoring equipment.

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

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

(a) A performance test demonstrating initial compliance for tanks HC #1 and HC #2 was performed on May 19, 1997. During the initial performance test, it was determined that the average overall pressure drop across the composite mesh pad system was 3.0+/-1 inches of water for HC #1 and 4.5+/-1 inches of water for HC #2 and the average outlet chromium concentration is 0.00239 mg/dscm.

(b) The Permittee is not required to further test tanks HC #1 and HC #2 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are 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.8 Performance Testing.

(c) Any change, modification, or reconstruction of the tanks HC #1 and HC #2, the packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C.8 Performance Testing.

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

(a) Pursuant to 40 CFR 63.343(c)(3) and 63.343(c)(1)(ii), when using a packed bed scrubber in conjunction with 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 3.0 ±1 inchs of water column of the pressure drop value for HC #1, and within 4.5 ±1 inchs of water column of the pressure drop value for HC #2, as established during the initial performance test.

(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.

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

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.14 General Record Keeping Requirements of this permit and include a minimum of the following:

(a) Inspection records for the packed-bed scrubber/**composite mesh-pad system**, and 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 tanks HC #1 and HC #2, the packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad, and monitoring equipment.

(c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks HC #1 and HC #2, the packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad*,* and monitoring equipment.

(d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks HC #1 and HC #2, the packed-bed scrubber/**composite mesh-pad system**, and composite mesh-pad 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.1.8(b), of each tank, during the reporting period.

2. The source has also requested that the table for recording the actual cumulative rectifier capacity be removed from the Ongoing Compliance Status Report form since it has already been removed from conditions in MSOP 097-11695-00325 through First Notice Only 097-14505-00325.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY, COMPLIANCE DATA SECTION
and CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT

Source Name:	R&S Plating, Inc.
Source Address:	2302 Bloyd Ave., Indianapolis, IN
Mailing Address:	2302 Bloyd Ave., Indianapolis, IN
Part 70 Permit No.:	097-11695-00325
Tank ID #:	HC #1 and HC #2
Type of process:	Hard
Monitoring Parameter:	composite mesh-pad system
Parameter Value:	shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test
Limits:	Total chromium concentration may not exceed 0.03mg/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, OAQ, Compliance Branch and OES.

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~~	~~NOV~~
~~MAR~~	~~JUN~~	~~SEP~~	~~DEC~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott L. Dombrowski, at (317) 327-2176.

Sincerely,

Original Signed by Jodi Perras Kusmer
Jodi Perras Kusmer, Acting Administrator
Indianapolis, OES

Attachments-Second Notice Only

SLD

cc: file (2 copies)
Mindy Hahn, IDEM OAQ

MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

R&S Plating, Inc.
2302 Bloyd Ave.
Indianapolis, Indiana 46218

(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 097-11695-00325	
Issued by: Mona A. Salem Chief Operationg Officer Department of Public Works City of Indianapolis	Issuance Date: September 5, 2000 Expiration Date: September 7, 2005

First Notice Only: 097-14505-00325	Pages Affected: 1, 4, 14, 15, 16, 17, 18, 24, and 26
Issued by: Vaneeta Kumar Administrator, OES City of Indianapolis	Issuance Date: September 19, 2001

Second Notice Only: 097-15469-00325	Pages Affected: 1, 4, 14, 15, 16, 17, 18, 18a, and 24
Issued by: Jodi Perras Kusmer Acting Administrator, OES City of Indianapolis	Issuance Date: March 1, 2002

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.2 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 chrome plating process.

Authorized Individual:	J. Michael Raymond
Source Address:	2302 Bloyd Ave., Indianapolis, IN 46218
Mailing Address:	2302 Bloyd Ave., Indianapolis, IN 46218
Phone Number:	(317) 925-4939
SIC Code:	3471
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit

A.2 Emissions units and Pollution Control Equipment Summary

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

(a) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 17,640,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #1, equipped with a packed-bed scrubber/mesh pad system as controls and a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

(b) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 23,520,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #2, equipped with a packed-bed scrubber/mesh pad system as controls and a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

(c) One (1) cold cleaner degreaser, utilizing one (1) gallon of mineral spirits a year, without a remote solvent reservoir, identified as Mineral Spirits;

(d) One (1) cold cleaner degreaser, utilizing 70 gallons of MEK (2-Butanone) a year, without a remote solvent reservoir, identified as MEK;

(e) Three (3) natural gas fueled space heaters, with a combined maximum heat input rate of 0.29 million Btu per hour, exhausting to stacks 9, 10, and 8, and identified as Space Heaters;

(f) One (1) natural gas fueled parts bake oven, with a maximum heat input rate of 0.02 million Btu per hour, identified as Parts Bake Oven;

(g) One natural gas fueled burner, with a maximum heat input rate of 0.02 million Btu per hour, identified as Burner.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Chromium Electroplating Operations
The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

(a) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 17,640,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #1, equipped with a packed-bed scrubber/composite mesh pad system as controls and a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

(b) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 23,520,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #2, equipped with a packed-bed scrubber/composite mesh pad system as controls and a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;

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 tanks HC #1 and HC #2.

D.1.2 Chromium Electroplating and Anodizing 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 tanks HC #1 and HC #2. 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 tanks HC #1 and HC #2.

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

(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 tanks, identified as tanks HC #1 and HC #2 above, are 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 tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.03 mg/dscm [$1.3x10^{-5}$ gr/dscf].

D.1.4 Work Practice Standards [40 CFR 63.342(f)] [326 IAC 20-8-1]
The following work practice standards apply to tanks HC #1 and HC #2:

(a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks HC #1 and HC #2, including the packed-bed scrubber/composite mesh pad system, and composite mesh-pad, 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, OAQ and OES, 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, OAQ and OES may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAQ and OES 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 tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh pad system, and composite mesh pad, 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 malfunction process equipment, packed-bed scrubber/composite mesh pad system, and composite mesh pad, and monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

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 tanks HC #1 and HC #2 and the packed-bed scrubber/composite mesh pad system, and composite mesh pad system.

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

(a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks HC #1 and HC #2. The OMP shall specify the operation and maintenance criteria for the tanks, the packed-bed scrubber/composite mesh pad system, and composite mesh pad, and monitoring equipment shall include the following elements:

(1) For the packed-bed scrubber/composite mesh-pad system (PBS/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 tanks HC #1 and HC #2, the air pollution control technique, packed-bed scrubber/composite mesh pad system, and composite mesh pad, and 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 tanks HC #1 and HC #2, the air pollution control device, the add-on air pollution control device 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 tanks HC #1 and HC #2, 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, OAQ and ERMD.

(e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ and OES for the life of tanks HC #1 and HC #2 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, OAQ and OES 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 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344] [326 IAC 20-8-1]

(a) A performance test demonstrating initial compliance for tanks HC #1 and HC #2 was performed on May 19, 1997. During the initial performance test, it was determined that the average overall pressure drop across the composite mesh pad system was 3.0 +1 inches of water for HC #1 and 4.5 +1 inches of water for HC #2 and the average outlet chromium concentration is 0.00239 mg/dscm.

(b) The Permittee is not required to further test tanks HC #1 and HC #2 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are 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.8 Performance Testing.

(c) Any change, modification, or reconstruction of the tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh pad system, and composite mesh pad or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C.8 Performance Testing.

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

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

(a) Pursuant to 40 CFR 63.343(c)(3) and 63.343(c)(1)(ii), when using a packed bed scrubber in conjunction with 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 3.0 ±1 inchs of water column of the pressure drop value for HC #1, and within 4.5 ±1 inchs of water column of the pressure drop value for HC #2, as established during the initial performance test.

(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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)] [326 IAC 2-8-5(3)

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

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.14 General Record Keeping Requirements of this permit and include a minimum of the following:

(a) Inspection records for the packed-bed scrubber/composite mesh pad system, and 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 tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh pad system, and composite mesh pad, and monitoring equipment.

(c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh pad system, and composite mesh pad, and monitoring equipment.

(d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh pad system, and composite mesh pad 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.1.8(b), of each tank, during the reporting period.

(k) Records of the actual cumulative rectifier capacity of each hard chromium electroplating tank expended during each month of the reporting period, and the total capacity expended to date for a reporting period.

(l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.10.

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

The notifications and reports required in this section shall be submitted to IDEM, OAQ and OES using the address specified in Section C.15 General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications

The Permittee shall notify IDEM, OAQ and OES 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY, COMPLIANCE DATA SECTION
and CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT

Source Name: R&S Plating, Inc.
Source Address: 2302 Bloyd Ave., Indianapolis, IN
Mailing Address: 2302 Bloyd Ave., Indianapolis, IN
Part 70 Permit No.: 097-11695-00325

Tank ID #: HC #1 and HC #2
Type of process: Hard
Monitoring Parameter: composite mesh-pad system
Parameter Value: shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test
Limits: Total chromium concentration may not exceed .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, OAQ, Compliance Branch and OES.

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