



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: August 31, 2009

RE: General Devices Co. / 097 - 19663 - 00233

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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**New Source Review and
Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**General Devices Co., Inc.
1410 South Post Road
Indianapolis, Indiana 46239**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source 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 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M097-19663-00233	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 31, 2009 Expiration Date: August 31, 2014

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	
B. GENERAL CONDITIONS	7
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.4 Term of Conditions [326 IAC 2-1.1-9.5]	
B.5 Enforceability	
B.6 Severability	
B.7 Property Rights or Exclusive Privilege	
B.8 Duty to Provide Information	
B.9 Certification	
B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.14 Permit Renewal [326 IAC 2-6.1-7]	
B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.16 Source Modification Requirement	
B.17 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.19 Annual Fee Payment [326 IAC 2-1.1-7]	
B.20 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	12
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.12 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.13 Response to Excursions or Exceedances	

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- C.15 Malfunctions Report [326 IAC 1-6-2]
- C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 18

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

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 Preventative Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.3 Particulate Control

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 19

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

- D.2.1 Particulate [326 IAC 6-2-4]

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 19

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

- D.3.1 Particulate [326 IAC 6-3-2]
- D.3.2 VOC Limit [326 IAC 8-2-9]
- D.3.3 Preventative Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.3.5 Record Keeping Requirements
- D.3.6 Reporting Requirements

E.1. NEW SOURCE PERFORMANCE STANDARDS (NSPS).....22

- E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, A]
- E.1.2 Standards of Performance for Surface Coating of Metal Furniture [40 CFR Part 60, Subpart EE]

E.2. National Emission Standards for Hazardous Air Pollutants (NESHAP).....23

- E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants [326 IAC 20-1-1][40 CFR 63, Subpart A]
- E.2.2 Area Source Plating and Polishing NESHAP [40 CFR 63, WWWWWW]

Certification.....24
Quartely Report.....25
Annual Notification26
Malfunction Report.....27

Attachment A: Standards of Performance for New Stationary Sources for Surface Coating of Metal Furniture

Attachment B: National Emission Standards for Hazarous Air Pollutants: Area Source Standards for Polishing and Plating Operations

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and 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 office computer cabinet metal fabrication, surface coating, and assembly plant.

Source Address:	1410 South Post Road, Indianapolis, Indiana 46239
Mailing Address:	1410 South Post Road, Indianapolis, IN 46239
General Source Phone Number:	(317) 897-7000
SIC Code:	2522
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) Grinding and sanding operations, identified as Sanding 1, constructed prior to 2006, with a maximum throughput of 320 pounds of metal per hour, with particulate emissions controlled by a dust collector with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot (g/acf) and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute (acfm), exhausting inside the building.
- (b) Natural gas-fired combustion sources with heat input of less than ten million (10,000,000) British thermal units per hour, constructed prior to 2006, consisting of the following:
 - (1) One (1) natural gas-fired boiler, identified as Plant 1 Boiler, with a maximum heat input capacity of 2.52 MMBtu per hour, with emissions exhausting to stack P1B.
 - (2) One (1) natural gas-fired drying oven, identified as Plant 1 Oven, with a maximum heat input capacity of 1.15 MMBtu per hour, with emissions exhausting to stack P1O.
 - (3) Two (2) natural gas-fired boilers, identified as Plant 2 Boiler 1 and Plant 2 Boiler 2, with a maximum heat input capacity of 0.77 MMBtu per hour, each, with emissions exhausting to stack P2B.
 - (4) Two (2) natural gas-fired drying ovens, identified as Plant 2 Oven 1 and Plant 2 Oven 2, with a maximum heat input capacity of 2.5 MMBtu per hour, each, with emissions exhausting to stack P2O1 and P2O2, respectively.
 - (5) One (1) natural gas-fired burn-off oven, identified as Plant 2 Burn-Off, with a

- maximum heat input capacity of 0.35 MMBtu per hour, with emissions exhausting to stack P2BO.
- (6) Two (2) natural gas-fired furnaces, identified as Plant 3 Furnace 1 and Plant 3 Furnace 2, with a maximum heat input capacity of 2.18 MMBtu per hour, each, with emissions exhausting to stack P3F1 and P3F2, respectively.
 - (c) One (1) booth for applying surface coatings to metal furniture, identified as Plant 1 Coating Line, constructed prior to 2006 and modified in 2007, with a maximum capacity of 80 units per hour, using dip application methods, with particulate emissions controlled by dry filters, and exhausting to stack SB 1.
 - (d) One (1) booth for applying surface coatings to metal furniture, identified as Plant 2 Coating Line 1, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB3.
 - (e) One (1) booth for applying surface coatings to metal furniture, identified as Plant 2 Coating Line 2, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB4. This is an affected facility under NSPS, Subpart EE.
 - (f) Welding operations, constructed prior to 2006, consisting of:
 - (1) Plant 2 welding operations, identified as P2W, using five (5) pounds of electrode per hour, with particulate emissions controlled by a dust collector, and exhausting to stack S1.
 - (2) Plant 3 welding operations, identified as P3W, using five (5) pound of electrode per hour, with particulate emissions controlled by a dust collector, and exhausting to stack S1.
 - (g) One (1) Sand blast machine, identified as Sand Blast 1, constructed prior to 2006, with a maximum blast rate of 100 pounds of abrasives per hour, and a maximum throughput of 320 pounds of metal per hour, with particulate emissions controlled by a baghouse, and exhausting to stack S2.
 - (h) One (1) zinc electroplating tank, identified as ZT1, modified in 2009, with a maximum capacity of 80 units per hour, using a sodium hydroxide bath. This is an affected unit under NESHAP, Subpart WWWWWW.
 - (i) Two (2) chromium non-electric dip coating tanks, identified as CT1 and CT2, modified in 2009, with a maximum capacity of 80 units per hour, each. These are affected units under NESHAP, Subpart WWWWWW.
 - (j) VOC and HAP storage containers with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than or equal to twelve thousand (12,000) gallons.
 - (k) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, and are not subject to 326 IAC 20-6.
 - (l) Cleaners and solvents characterized as having a vapor pressure less than or equal to two (2.0) kilo Pascals measured at thirty-eight (38) degrees Centigrade.

- (m) Activities associated with the treatment of wastewater streams with oil and grease content less than or equal to one percent (1%) by volume.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 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.3 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M097-19663-00233, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.4 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.5 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.6 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.8 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of

requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) 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, OAQ on or before the date it is due.

B.11 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 (PMPs) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (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; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M097-19663-00233 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:

- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
- (2) 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, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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, OAQ, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [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 change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and 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.3 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 thirty percent (30%) 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 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).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

- (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, OAQ.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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] [40 CFR 60] [40 CFR 63]

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, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 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 Quality (OAQ) 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 OAQ, 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.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) 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, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Grinding and sanding operations, identified as Sanding 1, constructed prior to 2006, with a maximum throughput of 320 pounds of metal per hour, with particulate emissions controlled by a dust collector with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot (g/acf) and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute (acfm), 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 [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(1) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grinding and sanding operations shall not exceed 1.20 pounds per hour when operating at a process weight rate of 320 tons per hour.

The pound per hour limitation was calculated with the following equation:

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:

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

D.1.2 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.3 Particulate Control

- (a) In order to comply with Condition D.1.1, the dust collector for particulate control shall be operation at all times that the grinding and sanding facility is in operation.
- (b) In the event that bag failure is observed in a multicompartment baghouse, if operation will continue for ten (10) days or more after the failure is observed before the failed units will be replaced or repaired, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas-fired boiler, identified as Plant 1 Boiler, with a maximum heat input capacity of 2.52 MMBtu per hour, with emissions exhausting to stack P1B.
- (b) Two (2) natural gas-fired boilers, identified as Plant 2 Boiler 1 and Plant 2 Boiler 2, with a maximum heat input capacity of 0.77 MMBtu per hour, each, with emissions exhausting to stack P2B.

(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 [326 IAC 2-6.1-5(a)(1)]

D.2.1 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Plant 1 Boiler shall be limited to 0.6 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Plant 2 Boiler 1 shall be limited to 0.6 pounds per MMBtu heat input.
- (c) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Plant 2 Boiler 2 shall be limited to 0.6 pounds per MMBtu heat input.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) booth for applying surface coatings to metal furniture, identified as Plant 2 Coating Line 1, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB3.
- (b) One (1) booth for applying surface coatings to metal furniture, identified as Plant 2 Coating Line 2, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB4.

(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 [326 IAC 2-6.1-5(a)(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from Plant 2 Coating Line 1 and Plant 2 Coating Line 2 shall be controlled by a dry filter, waterwash, or an equivalent control device. The control device shall be operated in accordance with the manufacturer's specification.

If overspray is visibly detected at the exhaust or accumulates on the ground the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such an observation:

- (a) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visible detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.3.2 VOC Limit [326 IAC 8-2-6]

When coating metal furniture, Plant 2 Coating Line 2 shall use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit makes 326 IAC 8-2-6 (VOC Requirements for Metal Furniture Coating) not applicable.

D.3.3 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.5 Record Keeping Requirements

- (a) To document compliance with D.3.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in D.3.2.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as clean up solvents.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION E.1 NEW SOURCE PERFORMANCE STANDARDS (NSPS)

Emissions Unit Description:

One (1) booth for applying surface coatings to metal furniture, identified as Plant 2 Coating Line 2, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB4. This is an affected facility under NSPS, Subpart EE.

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

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1 for the entire source except as otherwise specified in 40 CFR Part 60, Subpart EE.
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, In 46204-2251

E.1.2 Standards of Performance for Surface Coating of Metal Furniture [40 CFR Part 60, Subpart EE]

Pursuant to 40 CFR Part 60, Subpart EE, the Permittee shall comply with the provisions of Standards of Performance for Surface Coating of Metal Furniture, which are incorporated by reference as 326 IAC 12 for Plant 2 Coating Line 2 as specified as follows.

- (a) 40 CFR 60.310(a),(b)
- (b) 40 CFR 60.311
- (c) 40 CFR 60.312
- (d) 40 CFR 60.313(b),(c)(1)
- (e) 40 CFR 60.315(a)(1),(2)
- (f) 40 CFR 60.315(b),(d)
- (g) 40 CFR 60.316(a),(b),(c),(d)

SECTION E.2 National Emission Standards for Hazardous Air Pollutants (NESHAP)

Emissions Unit Description:

- (a) One (1) zinc electroplating tank, identified as ZT1, modified in 2009, with a maximum capacity of 80 units per hour, using a sodium hydroxide bath. This is an affected unit under NESHAP, Subpart WWWWWW.
- (b) Two (2) chromium non-electric dip coating tanks, identified as CT1 and CT2, modified in 2009, with a maximum capacity of 80 units per hour, each. These are an affected units under NESHAP, Subpart WWWWWW.

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

E.2.1 General Provisions Relating to NESHAP WWWWWW [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart WWWWWW.

E.2.2 Area Source Plating and Polishing NESHAP [40 CFR 63, Subpart WWWWWW]

The permittee shall comply with the following provisions of 40 CFR 63, Subpart WWW as specified is Attachment B of this permit:

- (a) 40 CFR 63.11504 (a)(1)(i)(ii)
- (b) 40 CFR 63.11504 (a)(2)-(3)
- (c) 40 CFR 63.11505 (a)(1)
- (d) 40 CFR 63.11505 (c)-(e)
- (e) 40 CFR 63.11506 (a)
- (f) 40 CFR 63.11507 (a)-(d)
- (g) 40 CFR 63.11507 (g)
- (h) 40 CFR 63.11508 (a)-(d)
- (i) 40 CFR 63.11510
- (j) 40 CFR 63.11511

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: General Devices Co., Inc.
Source Address: 1410 South Post Road, Indianapolis, IN 46239
Mailing Address: 1410 South Post Road, Indianapolis, IN 46239
MSOP No.: 097-19663-00233

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

MSOP Quarterly Report

Source Name: General Devices Co., Inc.
Source Address: 1410 South Post Road, Indianapolis, IN 46239
Mailing Address: 1410 South Post Road, Indianapolis, IN 46239
MSOP No.: 097-19663-00233
Parameter: VOC usage, Plant 2 Coating Line 2
Limit: <15 pounds per day

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**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:	General Devices Co., Inc.
Address:	1410 South Post Road
City:	Indianapolis, Indiana 46239
Phone #:	(317) 897-7000
MSOP #:	M097-19663-00233

I hereby certify that General Devices Co., Inc. is :

still in operation.

no longer in operation.

I hereby certify that General Devices Co., Inc. is :

in compliance with the requirements of MSOP M097-19663-00233.

not in compliance with the requirements of MSOP M097-19663-00233.

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 QUALITY FAX NUMBER: (317) 233-6865

**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 ?____, 100 TONS/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:

**New Source Review and Minor Source Operating
Permit
OFFICE OF AIR QUALITY**

**General Devices Co., Inc.
1410 South Post Road
Indianapolis, IN**

Attachment A

Title 40: Protection of Environment

Part 60 - Standards of Performance for New Stationary Sources

**Subpart EE—Standards of Performance for Surface Coating of
Metal Furniture**

M097-19663-00233

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

[Browse Previous](#) | [Browse Next](#)

Subpart EE—Standards of Performance for Surface Coating of Metal Furniture

Source: 47 FR 49287, Oct. 29, 1982, unless otherwise noted.

§ 60.310 Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each metal furniture surface coating operation in which organic coatings are applied.

(b) This subpart applies to each affected facility identified in paragraph (a) of this section on which construction, modification, or reconstruction is commenced after November 28, 1980.

(c) Any owner or operator of a metal furniture surface coating operation that uses less than 3,842 liters of coating (as applied) per year and keeps purchase or inventory records or other data necessary to substantiate annual coating usage shall be exempt from all other provisions of this subpart. These records shall be maintained at the source for a period of at least 2 years.

[47 FR 49287, Oct. 29, 1982, as amended at 50 FR 18248, Apr. 30, 1985]

§ 60.311 Definitions and symbols.

(a) All terms used in this subpart not defined below are given the meaning in the Act and in subpart A of this part.

Bake oven means a device which uses heat to dry or cure coatings.

Dip coating means a method of applying coatings in which the part is submerged in a tank filled with the coatings.

Electrodeposition (EDP) means a method of applying coatings in which the part is submerged in a tank filled with the coatings and in which an electrical potential is used to enhance deposition of the coatings on the part.

Electrostatic spray application means a spray application method that uses an electrical potential to increase the transfer efficiency of the coatings.

Flash-off area means the portion of a surface coating operation between the coating application area and bake oven.

Flow coating means a method of applying coatings in which the part is carried through a chamber containing numerous nozzles which direct unatomized streams of coatings from many different angles onto the surface of the part.

Organic coating means any coating used in a surface coating operation, including dilution solvents, from which volatile organic compound emissions occur during the application or the curing process. For the purpose of this regulation, powder coatings are not included in this definition.

Powder coating means any surface coating which is applied as a dry powder and is fused into a continuous coating film through the use of heat.

Spray application means a method of applying coatings by atomizing and directing the atomized spray toward the part to be coated.

Surface coating operation means the system on a metal furniture surface coating line used to apply and dry or cure an organic coating on the surface of the metal furniture part or product. The surface coating operation may be a prime coat or a top coat operation and includes the coating application station(s), flash-off area, and curing oven.

Transfer efficiency means the ratio of the amount of coating solids deposited onto the surface of a part or product to the total amount of coating solids used.

VOC content means the proportion of a coating that is volatile organic compounds (VOC's), expressed as kilograms of VOC's per liter of coating solids.

VOC emissions means the mass of volatile organic compounds (VOC's), expressed as kilograms of VOC's per liter of applied coating solids, emitted from a metal furniture surface coating operation.

(b) All symbols used in this subpart not defined below are given the meaning in the Act and in subpart A of this part.

C_a =the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon)

C_b =the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon)

C_f =the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon)

D_c =density of each coating, as received (kilograms per liter)

D_d =density of each diluent VOC-solvent (kilograms per liter)

D_r =density of VOC-solvent recovered by an emission control device (kilograms per liter)

E =VOC destruction efficiency of the control device (fraction)

F =the proportion of total VOC's emitted by an affected facility that enters the control device (fraction)

G =the volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter)

L_c =the volume of each coating consumed, as received (liters)

L_d =the volume of each diluent VOC-solvent added to coatings (liters)

L_r =the volume of VOC-solvent recovered by an emission control device (liters)

L_s =the volume of coating solids consumed (liters)

M_d =the mass of diluent VOC-solvent consumed (kilograms)

M_o =the mass of VOC's in coatings consumed, as received (kilograms)

M_r =the mass of VOC's recovered by an emission control device (kilograms)

N =the volume weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter)

Q_a =the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour)

Q_b =the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour)

Q_f =the volumetric flow rate of each gas stream emitted directly to the atmosphere (dry standard cubic meters per hour)

R =the overall VOC emission reduction achieved for an affected facility (fraction)

T =the transfer efficiency (fraction)

V_s =the proportion of solids in each coating (or input stream), as received (fraction by volume)

W_o =the proportion of VOC's in each coating (or input stream), as received (fraction by weight)

§ 60.312 Standard for volatile organic compounds (VOC).

(a) On and after the date on which the initial performance test required to be conducted by §60.8(a) is completed, no owner or operator subject to the provisions of this subpart shall cause the discharge into the atmosphere of VOC emissions from any metal furniture surface coating operation in excess of 0.90 kilogram of VOC per liter of coating solids applied.

§ 60.313 Performance tests and compliance provisions.

(a) Section 60.8(d) and (f) do not apply to the performance test procedures required by this subpart.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test each calendar month for each affected facility according to the procedures in this section.

(c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kilograms per liter of coating solids applied (G).

(1) An owner or operator shall use the following procedures for any affected facility which does not use a capture system and control device to comply with the emissions limit specified under §60.312. The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine the VOC content of coatings using Method 24. The owner or operator shall determine the volume of coating and the mass of VOC-solvent used for thinning purposes from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied (G) during each calendar month for each affected facility, except as provided under §60.313(c)(2) and (c)(3). Each monthly calculation is considered a performance test. Except as provided in paragraph (c)(1)(iv) of this section, the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied (G) each calendar month will be determined by the following procedures.

(A) Calculate the mass of VOC's used ($M_o + M_d$) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

($\sum L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received.)

Where: n is the number of different coatings used during the calendar month and m is the number of different diluent VOC-solvents used during the calendar month.

(B) Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

Where: n is the number of different coatings used during the calendar month.

Select the appropriate transfer efficiency from table 1. If the owner or operator can demonstrate to the satisfaction of the Administrator that transfer efficiencies other than those shown are appropriate, the Administrator will approve their use on a case-by-case basis. Transfer efficiency values for application methods not listed below shall be determined by the Administrator on a case-by-case basis. An owner or operator must submit sufficient data for the Administrator to judge the accuracy of the transfer efficiency claims.

Table 1—Transfer Efficiencies

Application methods	Transfer efficiency (T)
Air atomized spray	0.25
Airless spray	.25
Manual electrostatic spray	.60
Nonrotational automatic electrostatic spray	.70
Rotating head electrostatic spray (manual and automatic)	.80
Dip coat and flow coat	.90
Electrodeposition	.95

Where more than one application method is used within a single surface coating operation, the owner or operator shall determine the composition and volume of each coating applied by each method through a

means acceptable to the Administrator and compute the weighted average transfer efficiency by the following equation:

$$T = \frac{\sum_{i=1}^n L_{cik} V_{sik} T_k}{\sum_{k=1}^p L_s}$$

Where n is the number of coatings used and p is the number of application methods used.

(C) Calculate the volume-weighted average mass of VOC's consumed per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_e + M_d}{L_s T}$$

(ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N=G$$

(iii) Where the volume-weighted average mass of VOC discharged to the atmosphere per unit volume of coating solids applied (N) is less than or equal to 0.90 kilogram per liter, the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, which when divided by the lowest transfer efficiency at which the coating is applied, results in a value equal to or less than 0.90 kilogram per liter, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

(2) An owner or operator shall use the following procedures for any affected facility that uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under §60.312.

(i) Determine the overall reduction efficiency (R) for the capture system and control device. For the initial performance test the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test providing control device and capture system operating conditions have not changed. The procedure in, paragraphs (c)(2)(i) (A), (B), and (C), of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

(A) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^n C_{ni} Q_{bi}}{\sum_{i=1}^n C_{ni} Q_{bi} + \sum_{i=1}^n C_{ni} Q_{ci}}$$

Where

n is the number of gas streams entering the control device and

m is the number of gas streams emitted directly to the atmosphere.

(B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n Q_{vi} C_{vi} - \sum_{j=1}^m Q_{vj} C_{vj}}{\sum_{i=1}^n Q_{vi} C_{vi}}$$

Where:

n is the number of gas streams entering the control device, and

m is the number of gas streams leaving the control device and entering the atmosphere.

(C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF$$

(ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

(iii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G(1 - R)$$

(iv) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.90 kilogram per liter of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(3) An owner or operator shall use the following procedure for any affected facility which uses a control device that recovers the VOC's (e.g., carbon adsorber) to comply with the applicable emission limit specified under §60.312.

(i) Calculate the total mass of VOC's consumed ($M_o + M_d$) and the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraph (c)(1)(i) (A), (B), and (C) of this section.

(ii) Calculate the total mass of VOC's recovered (M_r) during each calendar month using the following equation:

$$M_r = L_r D_r$$

(iii) Calculate overall reduction efficiency of the control device (R) for each calendar month for each affected facility using the following equation:

$$R = \frac{M_r}{M_o + M_d}$$

(iv) Calculate the volume-weighted average mass of VOC's emitted to the atmosphere (N) for each calendar month for each affected facility using equation in paragraph (c)(2)(iii) of this section.

(v) If the weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.90 kilogram per liter of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

[47 FR 49287, Oct. 29, 1982, as amended at 65 FR 61759, Oct. 17, 2000]

§ 60.314 Monitoring of emissions and operations.

(a) The owner or operator of an affected facility which uses a capture system and an incinerator to comply with the emission limits specified under §60.312 shall install, calibrate, maintain, and operate temperature measurement devices according to the following procedures:

(1) Where thermal incineration is used, a temperature measurement device shall be installed in the firebox. Where catalytic incineration is used, a temperature measurement device shall be installed in the gas stream immediately before and after the catalyst bed.

(2) Each temperature measurement device shall be installed, calibrated, and maintained according to the manufacturer's specifications. The device shall have an accuracy of the greater of 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 2.5 °C.

(3) Each temperature measurement device shall be equipped with a recording device so that a permanent continuous record is produced.

(b) The owner or operator of an affected facility which uses a capture system and a solvent recovery system to comply with the emission limits specified under §60.312 shall install the equipment necessary to determine the total volume of VOC-solvent recovered daily.

§ 60.315 Reporting and recordkeeping requirements.

(a) The reporting requirements of §60.8(a) apply only to the initial performance test. Each owner or operator subject to the provisions of this subpart shall include the following data in the report of the initial performance test required under §60.8(a):

(1) Except as provided in paragraph (a)(2) of this section, the volume-weighted average mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) for a period of one calendar month from each affected facility.

(2) For each affected facility where compliance is determined under the provisions of §60.313(c)(1)(iv), a list of the coatings used during a period of one calendar month, the VOC content of each coating calculated from data determined using Method 24 or supplied by the manufacturer of the coating, and the minimum transfer efficiency of any coating application equipment used during the month.

(3) For each affected facility where compliance is achieved through the use of an incineration system, the following additional information will be reported:

(i) The proportion of total VOC's emitted that enters the control device (F),

(ii) The VOC reduction efficiency of the control device (E),

(iii) The average combustion temperature (or the average temperature upstream and downstream of the catalyst bed), and

(iv) A description of the method used to establish the amount of VOC's captured and sent to the incinerator.

(4) For each affected facility where compliance is achieved through the use of a solvent recovery system, the following additional information will be reported:

(i) The volume of VOC-solvent recovered (L_r), and

(ii) The overall VOC emission reduction achieved (R).

(b) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.312. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit at the frequency specified in §60.7(c) the following:

(1) Where compliance with §60.312 is achieved through the use of thermal incineration, each 3-hour period when metal furniture is being coated during which the average temperature of the device was more than 28 °C below the average temperature of the device during the most recent performance test at which destruction efficiency was determined as specified under §60.313.

(2) Where compliance with §60.312 is achieved through the use of catalytic incineration, each 3-hour period when metal furniture is being coated during which the average temperature of the device immediately before the catalyst bed is more than 28 °C below the average temperature of the device immediately before the catalyst bed during the most recent performance test at which destruction efficiency was determined as specified under §60.313. Additionally, when metal furniture is being coated, all 3-hour periods during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference across the catalyst bed during the most recent performance test at which destruction efficiency was determined as specified under §60.313 will be recorded.

(3) For thermal and catalytic incinerators, if no such periods as described in paragraphs (c)(1) and (c)(2) of this section occur, the owner or operator shall state this in the report.

(d) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine VOC emissions from each affected facility. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion chamber temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed. Where compliance is achieved through the use of a solvent recovery system, the owner or operator shall maintain at the source daily records of the amount of solvent recovered by the system for each affected facility.

[47 FR 49287, Oct. 29, 1982, as amended at 55 FR 51383, Dec. 13, 1990; 65 FR 61759, Oct. 17, 2000]

§ 60.316 Test methods and procedures.

(a) The reference methods in appendix A to this part except as provided under §60.8(b) shall be used to determine compliance with §60.312 as follows:

(1) Method 24, or coating manufacturer's formulation data, for use in the determination of VOC content of each batch of coating as applied to the surface of the metal parts. In case of an inconsistency between the Method 24 results and the formulation data, the Method 24 results will govern.

(2) Method 25 for the measurement of VOC concentration.

(3) Method 1 for sample and velocity traverses.

(4) Method 2 for velocity and volumetric flow rate.

(5) Method 3 for gas analysis.

(6) Method 4 for stack gas moisture.

(b) For Method 24, the coating sample must be at least a 1 liter sample in a 1 liter container taken at a point where the sample will be representative of the coating material as applied to the surface of the metal part.

(c) For Method 25, the minimum sampling time for each of 3 runs is 60 minutes and the minimum sample volume is 0.003 dry standard cubic meters except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

**New Source Review and Minor Source Operating
Permit
OFFICE OF AIR QUALITY**

**General Devices Co., Inc.
1410 South Post Road
Indianapolis, IN**

Attachment B

Title 40: Protection of Environment

**Part 63- National Emission Standards for Hazardous Air
Pollutants**

**Subpart WWWW - Area Source Standards for Plating and
Polishing Operations**

M097-19663-00233

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

[Browse Previous](#) | [Browse Next](#)

Subpart WWWW—National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Source: 73 FR 37741, July 1, 2008, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11504 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a plating and polishing facility that is an area source of hazardous air pollutant (HAP) emissions and meets the criteria specified in paragraphs (a)(1) through (3) of this section.

(1) A plating and polishing facility is a plant site that is engaged in one or more of the processes listed in paragraphs (a)(1)(i) through (vi) of this section.

(i) Electroplating other than chromium electroplating (i.e., non-chromium electroplating).

(ii) Electroless or non-electrolytic plating.

(iii) Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.

(iv) Dry mechanical polishing of finished metals and formed products after plating.

(v) Electroforming.

(vi) Electropolishing.

(2) An area source of HAP emissions is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.

(3) Your plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal HAP, which means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, as defined in §63.11511, "What definitions apply to this subpart?" With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.

(b) [Reserved]

§ 63.11505 What parts of my plant does this subpart cover?

(a) This subpart applies to each new or existing affected source, as specified in paragraphs (a)(1) through (3) of this section, at all times. A new source is defined in §63.11511, "What definitions apply to this subpart?"

(1) Each tank that contains one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?", and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

(2) Each thermal spraying operation that applies one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?"

(3) Each dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP, as defined in §63.11511, "What definitions apply to this subpart?"

(b) An affected source is existing if you commenced construction or reconstruction of the affected source on or before March 14, 2008.

(c) An affected source is new if you commenced construction or reconstruction of the affected source after March 14, 2008.

(d) This subpart does not apply to any of the process units or operations described in paragraphs (d)(1) through (6) of this section.

(1) Process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).

(2) Research and development process units, as defined in §63.11511, "What definitions apply to this subpart?"

(3) Process units that are used strictly for educational purposes.

(4) Thermal spraying conducted to repair surfaces.

(5) Dry mechanical polishing conducted to restore the original finish to a surface to apply to restoring the original finish.

(6) Any plating or polishing process that does not use any material that contains cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, or that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Material Safety Data Sheet for the material.

(e) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, "Title V," provided you are not otherwise required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

§ 63.11506 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart no later than July 1, 2010.

(b) If you own or operate a new affected source for which the initial startup date is on or before July 1, 2008, you must achieve compliance with the provisions of this subpart no later than July 1, 2008.

(c) If you own or operate a new affected source for which the initial startup date is after July 1, 2008, you must achieve compliance with the provisions of this subpart upon initial startup of your affected source.

Standards and Compliance Requirements

§ 63.11507 What are my standards and management practices?

(a) If you own or operate an affected new or existing non-cyanide electroplating, electroforming, or electropolishing tank (hereafter referred to as an “electrolytic” process tank, as defined in §63.11511, “What definitions apply to this subpart?”) that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, you must comply with the requirements in paragraph (a)(1), (2), or (3) of this section, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(1) You must use a wetting agent/fume suppressant, as defined in §63.11511, “What definitions apply to this subpart?”, in the bath of the affected tank according to paragraphs (a)(1)(i) through (iii) of this section.

(i) You must initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.

(ii) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

(iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.

(2) You must capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, according to paragraphs (a)(2)(i) and (ii) of this section.

(i) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(ii) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(3) You must cover the tank surface according to paragraph (a)(3)(i) or (ii) of this section.

(i) For batch electrolytic process tanks, as defined in §63.11511, “What definitions apply to this subpart?”, you must use a tank cover, as defined in §63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time.

(ii) For continuous electrolytic process tanks, as defined in §63.11511, “What definitions apply to this subpart?”, you must cover at least 75 percent of the surface of the tank, as defined in §63.11511, whenever the electrolytic process tank is in operation.

(b) If you own or operate an affected new or existing “flash” or short-term electroplating tank, as defined in §63.11511, “What definitions apply to this subpart?”, that uses or emits one or more of the plating and polishing metal HAP, you must comply with the requirements specified in paragraph (b)(1) or (b)(2), and implement the applicable management practices in paragraph (g) of this section, as practicable.

(1) You must limit short-term or “flash” electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(2) You must use a tank cover, as defined in §63.11511, “What definitions apply to this subpart?”, for at least 95 percent of the plating time.

(c) If you own or operate an affected new or existing process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that does not meet the definition of short-term or flash electroplating) and contains one or more of the plating and polishing metal

HAP, you must meet the requirements specified in paragraph (a) or (b) of this section, whichever apply to the process operation, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(d) If you own or operate an affected new or existing electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAP, you must comply with the requirements in paragraphs (d)(1) and (2) of this section:

(1) You must measure and record the pH of the tank upon start-up. No additional pH measurements are required.

(2) You must implement the applicable management practices in paragraph (g) of this section, as practicable.

(e) If you own or operate an affected new or existing dry mechanical polishing equipment that emits one or more of the plating and polishing metal HAP, you must operate a capture system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter, according to paragraphs (e)(1) and (2) of this section.

(1) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(2) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(f) If you own or operate an affected thermal spraying operation that applies one or more of the plating and polishing metal HAP, you must meet the applicable requirements specified in paragraphs (f)(1) through (3) of this section, and the applicable management practices in paragraph (g) of this section.

(1) For existing permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a water curtain, fabric filter, or HEPA filter, according to paragraphs (f)(1)(i) and (ii) of this section.

(i) You must operate all capture and control devices according to the manufacturer's specifications and instructions.

(ii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(2) For new permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a fabric or HEPA filter, according to paragraphs (f)(2)(i) and (ii) of this section.

(i) You must operate all capture and control devices according to the manufacturer's specifications and instructions.

(ii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(3) For temporary thermal spraying operations, as defined in §63.11511 "What definitions apply to this subpart?", you must meet the applicable requirements specified in paragraphs (f)(3)(i) and (ii) of this section.

(i) You must document the amount of time the thermal spraying occurs each day, and where it is conducted.

(ii) You must implement the applicable management practices specified in paragraph (g) of this section, as practicable.

(g) If you own or operate an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, you must implement the applicable management practices in paragraphs (g)(1) through (12) of this section, as practicable.

(1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.

(2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.

(3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.

(4) Use tank covers, if already owned and available at the facility, whenever practicable.

(5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).

(6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.

(7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.

(8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.

(9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.

(10) Minimize spills and overflow of tanks, as practicable.

(11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.

(12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

§ 63.11508 What are my compliance requirements?

(a) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with §63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"

(b) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times.

(c) To demonstrate initial compliance, you must satisfy the requirements specified in paragraphs (c)(1) through (11) of this section.

(1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What

are my standards and management practices?”, and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(1)(i) through (iv) of this section.

(i) You must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.

(ii) You must state in your Notification of Compliance Status that you add wetting agent/fume suppressant to the bath according to manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in §63.11507(g), “What are my standards and management practices?”, as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), “What are my standards and management practices?”, as practicable.

(2) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), “What are my standards and management practices?”, and you use a control system, as defined in §63.11511, “What definitions apply to this subpart?”, to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(2)(i) through (v) of this section.

(i) You must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.

(ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in §63.11507(g), “What are my standards and management practices?”, as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), “What are my standards and management practices?”, as practicable.

(v) You must follow the manufacturer's specifications and operating instructions for the control systems at all times.

(3) If you own or operate an affected batch electrolytic process tank, as defined in §63.11511, “What definitions apply to this subpart?”, that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in §63.11507(a), “What are my standards and management practices?”, and you use a tank cover, as defined in §63.11511, to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(3)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.

(iii) You must implement the applicable management practices specified in §63.11507(g), “What are my standards and management practices?”, as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), “What are my standards and management practices?”, as practicable.

(4) If you own or operate an affected continuous electrolytic process tank, as defined in §63.11511, "What definitions apply to this subpart?", that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you cover the tank surface to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(4)(i) through (iv) of this section.

(i) You must cover at least 75 percent of the surface area of the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the surface cover in place whenever the continuous electrolytic process is in operation.

(iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply with this subpart by limiting the plating time of the affected tank, you must demonstrate initial compliance according to paragraphs (c)(5)(i) through (iii) of this section.

(i) You must state in your Notification of Compliance Status that you limit short-term or flash electroplating to no more than 1 cumulative hour per day, or 3 cumulative minutes per hour of plating time.

(ii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(6) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply by operating the affected tank with a cover, you must demonstrate initial compliance according to paragraphs (c)(6)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the plating time.

(iii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(7) If you own or operate an affected tank that contains one or more of the plating and polishing metal HAP, uses cyanide in the bath, and is subject to the management practices specified in §63.11507(d), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(7)(i) through (iii) of this section.

(i) You must report in your Notification of Compliance Status the pH of the bath solution that was measured at start-up, according to the requirements of §63.11507(d)(1).

(ii) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11490(g), "What are my standards and management practices?", as practicable.

(8) If you own or operate an affected dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(e), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(8)(i) through (iii) of this section.

(i) You must install a control system that is designed to capture PM emissions from the polishing operation and exhaust them to a cartridge, fabric, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(9) If you own or operate an existing affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(1), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(9)(i) through (iii) of this section.

(i) You must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water curtain, fabric filter, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed and are operating the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(10) If you own or operate a new affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(2), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(10)(i) through (iii) of this section.

(i) You must install and operate a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a fabric or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed and operate the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(11) If you own or operate an affected temporary thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(3), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(11)(i) and (ii) of this section.

(i) You must implement the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(ii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), "What are my standards and management practices?", as practicable.

(d) To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, you must satisfy the requirements specified in paragraphs (d)(1) through (8) of this section.

(1) You must always operate and maintain your affected source, including air pollution control equipment.

(2) You must prepare an annual compliance certification according to the requirements specified in §63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review.

(3) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate continuous compliance according to paragraphs (d)(3)(i) through (iii) of this section.

(i) You must record that you have added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank.

(ii) For tanks where the wetting agent/fume suppressant is a separate purchased ingredient from the other tank additives, you must demonstrate continuous compliance according to paragraphs (d)(3)(ii) (A) and (B) this section.

(A) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

(B) You must record each addition of wetting agent/fume suppressant to the tank bath.

(iii) You must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

(4) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart; an affected dry mechanical polishing operation that is subject to §63.11507(e); or an affected thermal spraying operation that is subject to §63.11507(f)(1) or (2), you must demonstrate continuous compliance according to paragraphs (d)(4)(i) through (v) of this section.

(i) You must operate and maintain the control system according to the manufacturer's specifications and instructions.

(ii) Following any malfunction or failure of the capture or control devices to operate properly, you must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions.

(iii) You must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.

(iv) You must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.

(v) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply with this subpart by limiting the plating time for the affected tank, you must demonstrate continuous compliance according to paragraphs (d)(5)(i) through (iii) of this section.

(i) You must limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(ii) You must record the times that the affected tank is operated each day.

(iii) You must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(6) If you own or operate an affected batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of §63.11507(a), "What are my standards and management practices?", or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and you comply by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(6)(i) through (iii) of this section.

(i) You must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.

(ii) You must record the times that the tank is operated and the times that the tank is covered on a daily basis.

(iii) You must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.

(7) If you own or operate an affected continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you cover your tanks to comply with this subpart, you must demonstrate continuous compliance according to paragraphs (d)(7)(i) and (ii) of this section.

(i) You must operate the tank with at least 75 percent of the surface covered during all periods of electrolytic process operation.

(ii) You must state in your annual certification that you have operated the tank with 75 percent of the surface covered during all periods of electrolytic process operation.

(8) If you own or operate an affected tank or other operation that is subject to the management practices specified in §63.11507(g), "What are my standards and management practices?", you must demonstrate continuous compliance according to paragraphs (d)(8)(i) and (ii) of this section.

(i) You must implement the applicable management practices during all times that the affected tank or process is in operation.

(ii) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

§ 63.11509 What are my notification, reporting, and recordkeeping requirements?

(a) If you own or operate an affected source, as defined in §63.11505(a), "What parts of my plant does this subpart cover?", you must submit an Initial Notification in accordance with paragraphs (a)(1) through (4) of this section by the dates specified.

(1) The Initial Notification must include the information specified in §63.9(b)(2)(i) through (iv) of the General Provisions of this part.

(2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.

(3) If you start up your affected source on or before July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after July 1, 2008.

(4) If you start up your new affected source after July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after you become subject to this subpart.

(b) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with paragraphs (b)(1) and (2) of this section.

(1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in §63.11506, "What are my compliance dates?"

(2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this section.

(i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.

(ii) Methods used to comply with the applicable management practices and equipment standards.

(iii) Description of the capture and emission control systems used to comply with the applicable equipment standards.

(iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.

(c) If you own or operate an affected source, you must prepare an annual certification of compliance report according to paragraphs (c)(1) through (7) of this section. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.

(1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a)(1), "What are my standards and management practices?", you must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

(2) If you own or operate any one of the affected sources listed in paragraphs (c)(2)(i) through (iii) of this section, you must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.

(i) Electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart;

(ii) Dry mechanical polishing operation that is subject to §63.11507(e); or

(iii) Permanent thermal spraying operation that is subject to §63.11507(f)(1) or (2).

(3) If you own or operate an affected flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply with this subpart by limiting the plating time of the affected tank, you must state in your annual compliance

certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(4) If you own or operate an affected batch electrolytic process tank that is subject to the requirements of §63.11507(a) or a flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), "What are my standards and management practices?", and you comply by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.

(5) If you own or operate an affected continuous electrolytic process tank that is subject to the requirements of §63.11507(a), "What are my standards and management practices?", and you comply by operating the affected tank with a cover, you must state in your annual certification that you have covered at least 75 percent of the surface area of the tank during all periods of electrolytic process operation.

(6) If you own or operate an affected tank that is subject to the management practices specified in §63.11507(g), "What are my standards and management practices?", you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

(7) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

(d) If you own or operate an affected source, and any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority.

(e) You must keep the records specified in paragraphs (e)(1) through (3) of this section.

(1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.

(2) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part.

(3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in §63.11508(d), "What are my compliance requirements?"

(f) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years.

Other Requirements and Information

§ 63.11510 What General Provisions apply to this subpart?

If you own or operate a new or existing affected source, you must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

§ 63.11511 What definitions apply to this subpart?

Terms used in this subpart are defined in this section.

Batch electrolytic process tank means a tank used for an electrolytic process in which a part or group of parts, typically mounted on racks or placed in barrels, is placed in the tank and immersed in an electrolytic

process solution as a single unit (i.e., as a batch) for a predetermined period of time, during which none of the parts are removed from the tank and no other parts are added to the tank, and after which the part or parts are removed from the tank as a unit.

Bath means the liquid contents of a tank that is used for electroplating, electroforming, electropolishing, or other metal coating processes at a plating and polishing facility.

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device, as part of a complete control system. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

Cartridge filter means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge filters can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

Composite mesh pad means a type of control device similar to a mesh pad mist eliminator except that the device is designed with multiple pads in series that are woven with layers of material with varying fiber diameters, which produce a coalescing effect on the droplets or PM that impinge upon the pads.

Continuous electrolytic process tank means a tank that uses an electrolytic process and in which a continuous metal strip or other type of continuous substrate is fed into and removed from the tank continuously. This process is also called reel-to-reel electrolytic plating.

Control device means equipment that is part of a control system that collects and/or reduces the quantity of a pollutant that is emitted to the air. The control device receives emissions that are transported from the process by the capture system.

Control system means the combination of a capture system and a control device. The capture system is designed to collect and transport air emissions from the affected source to the control device. The overall control efficiency of any control system is a combination of the ability of the system to capture the air emissions (i.e., the capture efficiency) and the control device efficiency. Consequently, it is important to achieve good capture to ensure good overall control efficiency. Capture devices that are known to provide high capture efficiencies include hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans.

Cyanide plating means plating processes performed in tanks that use cyanide as a major bath ingredient and that operate at pH of 12 or more, and use or emit any of the plating and polishing metal HAP, as defined in this section. Electroplating and electroforming are performed with or without cyanide. The cyanide in the bath works to dissolve the HAP metal added as a cyanide compound (e.g., cadmium cyanide) and creates free cyanide in solution, which helps to corrode the anode. These tanks are self-regulating to a pH of 12 due to the caustic nature of the cyanide bath chemistry. The cyanide in the bath is a major bath constituent and not an additive; however, the self-regulating chemistry of the bath causes the bath to act as if wetting agents/fume suppressants are being used and to ensure an optimum plating process. All cyanide plating baths at pH greater than or equal to 12 have cyanide-metal complexes in solution. The metal HAP to be plated is not emitted because it is either bound in the metal-cyanide complex or reduced at the cathode to elemental metal, and plated onto the immersed parts. Cyanide baths are not intentionally operated at pH less 12 since unfavorable plating conditions would occur in the tank, among other negative effects.

Deviation means any instance in which an affected source or an owner or operator of such an affected source:

(1) Fails to meet any requirement or obligation established by this rule including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this rule and that is included in the operating permit for any affected facility required to obtain such a permit; or

(3) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this rule during startup, shutdown, or malfunction.

Dry mechanical polishing means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating with any of the plating and polishing metal HAP, as defined in this section, using hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles.

Electroforming means an electrolytic process using or emitting any of the plating and polishing metal HAP, as defined in this section, that is used for fabricating metal parts. This process is essentially the same as electroplating except that the plated substrate (mandrel) is removed, leaving only the metal plate. In electroforming, the metal plate is self-supporting and generally thicker than in electroplating.

Electroless plating means a non-electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Electroless plating is also called non-electrolytic plating. Examples include, but are not limited to, chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

Electrolytic plating processes means electroplating and electroforming that use or emit any of the plating and polishing metal HAP, as defined in this section, where metallic ions in a plating bath or solution are reduced to form a metal coating on the surface of parts and products using electrical energy.

Electroplating means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metal ions in solution are reduced onto the surface of the work piece (the cathode) via an electrical current. The metal ions in the solution are usually replenished by the dissolution of metal from solid metal anodes fabricated of the same metal being plated, or by direct replenishment of the solution with metal salts or oxides; electroplating is also called electrolytic plating.

Electropolishing means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing.

Fabric filter means a type of control device used for collecting PM by filtering a process exhaust stream through a filter or filter media. A fabric filter is also known as a baghouse.

Flash electroplating means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or no more than 1 cumulative hour per day.

General Provisions of this part (40 CFR part 63, subpart A) means the section of the Code of Federal Regulations (CFR) that addresses air pollution rules that apply to all HAP sources addressed in part 63, which includes the National Emission Standards for Hazardous Air Pollutants (NESHAP).

HAP means hazardous air pollutant as defined from the list of 188 chemicals and compounds specified in the CAA Amendments of 1990; HAP are also called "air toxics." The five plating and polishing metal HAP, as defined in this section, are on this list of 188 chemicals.

High efficiency particulate air (HEPA) filter means a type of control device that uses a filter composed of a mat of randomly arranged fibers and is designed to remove at least 99.97 percent of airborne particles that are 0.3 micrometers or larger in diameter.

Mesh pad mist eliminator means a type of control device, consisting of layers of interlocked filaments densely packed between two supporting grids that remove liquid droplets and PM from the gas stream through inertial impaction and direct interception.

Metal coating operation means any process performed either in a tank that contains liquids or as part of a spraying operation that applies one or more plating and polishing metal HAP, as defined in this section, to parts and products used in manufacturing. These processes include but are not limited to: Non-chromium electroplating; electroforming; electropolishing; other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.

New source means any affected source for which you commenced construction or reconstruction after March 14, 2008.

Non-cyanide electrolytic plating and electropolishing processes means electroplating, electroforming, and electropolishing that uses or emits any of the plating and polishing metal HAP, as defined in this section, performed without cyanide in the tank. These processes do not use cyanide in the tank and operate at pH values less than 12. These processes use electricity and add or remove metals such as metal HAP from parts and products used in manufacturing. Both electroplating and electroforming can be performed with cyanide as well.

Non-electrolytic plating means a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Non-electrolytic plating is also called electroless plating. Examples include chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

Packed-bed scrubber means a type of control device that includes a single or double packed bed that contains packing media on which PM and droplets impinge and are removed from the gas stream. The packed-bed section of the scrubber is followed by a mist eliminator to remove any water entrained from the packed-bed section.

Plating and polishing facility means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP, as defined in this section: Electroplating processes other than chromium electroplating (i.e., non-chromium electroplating); electroless plating; other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating.

Plating and polishing metal HAP means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Any material that does not contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight, and does not contain manganese in amounts greater than or equal to 1.0 percent by weight, as reported on the Material Safety Data Sheet for the material, is not considered to be a plating and polishing metal HAP.

Plating and polishing process tanks means any tank in which a process is performed at an affected plating and polishing facility that uses or has the potential to emit any of the plating and polishing metal HAP, as defined in this section. The processes performed in plating and polishing tanks include the following: Electroplating processes other than chromium electroplating (i.e., non-chromium electroplating) performed in a tank; electroless plating; and non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and electropolishing. This term does not include tanks containing solutions that are used to rinse or wash parts prior to placing the parts in a plating and polishing process tank, or subsequent to removing the parts from a plating and polishing process tank. This term also does not include thermal spraying or dry polishing with machines.

PM means solid or particulate matter that is emitted into the air.

Research and development process unit means any process unit that is used for conducting research and development for new processes and products and is not used to manufacture products for commercial sale, except in a *de minimis* manner.

Short-term plating means an electroplating process that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or 1 hour cumulative per day.

Tank cover for batch process units means a solid structure made of an impervious material that is designed to cover the entire open surface of a tank or process unit that is used for plating or other metal coating processes.

Tank cover for continuous process units, means a solid structure or combination of structures, made of an impervious material that is designed to cover at least 75 percent of the open surface of the tank or process unit that is used for continuous plating or other continuous metal coating processes.

Temporary thermal spraying means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying.

Thermal spraying (also referred to as metal spraying or flame spraying) is a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a metallic coating is applied by projecting molten or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying.

Water curtain means a type of control device that draws the exhaust stream through a continuous curtain of moving water to scrub out suspended PM.

Wetting agent/fume suppressant means any chemical agent that reduces or suppresses fumes or mists from a plating and polishing tank by reducing the surface tension of the tank bath.

§ 63.11512 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that cannot be delegated to State, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emissions standard under 40 CFR 63.6(g), of the General Provisions of this part.

(2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.

(3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A "major change to test method" is defined in §63.90.

(4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A “major change to monitoring” is defined in §63.90.

(5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in §63.90.

§ 63.11513 [Reserved]

Table 1 to Subpart WWWW of Part 63. Applicability of General Provisions to Plating and Polishing Area Sources

As required in §63.11510, “What General Provisions apply to this subpart?”, you must meet each requirement in the following table that applies to you.

Citation	Subject
63.1	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.6(a), (b)(1)–(b)(5), (c)(1), (c)(2), (c)(5), (j)	Compliance with standards and maintenance requirements.
63.10(a), (b)(1), (b)(2)(i)–(iii),(xiv), (b)(3), (d)(1), (f)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.

¹Section 63.11505(e), “What parts of my plant does this subpart cover?”, exempts affected sources from the obligation to obtain title V operating permits.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Review and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	General Devices Co., Inc.
Source Location:	1410 South Post Road, Indianapolis, IN 46239
County:	Marion
SIC Code:	2522
Operation Permit No.:	097-19663-00233
Permit Reviewer:	Jillian Bertram

On October 4, 2004, the Office of Air Quality (OAQ) received an application from General Devices Co., Inc. related to the operation of an existing office computer cabinet metal fabrication, surface coating, and assembly plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when

evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM_{2.5}

Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by General Devices Co., Inc. on October 4, 2004, relating to operation of an existing office computer cabinet metal fabrication, surface coating, and assembly plant. All units were previously unpermitted. Based on the potential to emit, a New Source Review (NSR) and MSOP is required.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) Welding operations, constructed prior to 2006, consisting of:
- (1) Plant 2 welding operations, identified as P2W, using five (5) pounds of electrode per hour, with particulate emissions controlled by a dust collector, and exhausting to stack S1.
 - (2) Plant 3 welding operations, identified as P3W, using five (5) pound of electrode per hour, with particulate emissions controlled by a dust collector, and exhausting to stack S1.
- (b) Grinding and sanding operations, identified as Sanding 1, constructed prior to 2006, with a maximum throughput of 320 pounds of metal per hour, with particulate emissions controlled by a dust collector with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot (g/acf) and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute (acfm), exhausting inside the building.
- (c) One (1) Sand blast machine, identified as Sand Blast 1, constructed prior to 2006, with a maximum blast rate of 100 pounds of abrasives per hour, and a maximum throughput of 320

- pounds of metal per hour, with particulate emissions controlled by a baghouse, and exhausting to stack S2.
- (d) Natural gas-fired combustion sources with heat input of less than ten million (10,000,000) British thermal units per hour, constructed prior to 2006, consisting of the following:
- (1) One (1) natural gas-fired boiler, identified as Plant 1 Boiler, with a maximum heat input capacity of 2.52 MMBtu per hour, with emissions exhausting to stack P1B.
 - (2) One (1) natural gas-fired drying oven, identified as Plant 1 Oven, with a maximum heat input capacity of 1.15 MMBtu per hour, with emissions exhausting to stack P1O.
 - (3) Two (2) natural gas-fired boilers, identified as Plant 2 Boiler 1 and Plant 2 Boiler 2, with a maximum heat input capacity of 0.77 MMBtu per hour, each, with emissions exhausting to stack P2B.
 - (4) Two (2) natural gas-fired drying ovens, identified as Plant 2 Oven 1 and Plant 2 Oven 2, with a maximum heat input capacity of 2.5 MMBtu per hour, each, with emissions exhausting to stack P2O1 and P2O2, respectively.
 - (5) One (1) natural gas-fired burn-off oven, identified as Plant 2 Burn-Off, with a maximum heat input capacity of 0.35 MMBtu per hour, with emissions exhausting to stack P2BO.
 - (6) Two (2) natural gas-fired furnaces, identified as Plant 3 Furnace 1 and Plant 3 Furnace 2, with a maximum heat input capacity of 2.18 MMBtu per hour, each, with emissions exhausting to stack P2F1 and P2F2, respectively.
- (e) One (1) booth for applying surface coatings to metal office furniture, identified as Plant 1 Coating Line, constructed prior to 2006 and modified in 2007, with a maximum capacity of 80 units per hour, using dip application methods, with particulate emissions controlled by dry filters, and exhausting to stack SB1.
- (f) One (1) booth for applying surface coatings to metal office furniture, identified as Plant 2 Coating Line 1, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB3.
- (g) One (1) booth for applying surface coatings to metal office furniture, identified as Plant 2 Coating Line 2, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB4. This is an affected unit under NSPS, Subpart EE.
- (h) One (1) zinc electroplating tank, identified as ZT1, modified in 2009, with a maximum capacity of 80 units per hour, using a sodium hydroxide bath. This is an affected unit under NESHAP, Subpart WWWWWW.
- (i) Two (2) chromium non-electric dip coating tanks, identified as CT1 and CT2, modified in 2009, with a maximum capacity of 80 units per hour, each. These are affected units under NESHAP, Subpart WWWWWW.
- (j) VOC and HAP storage containers with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than or equal to twelve thousand (12,000) gallons.
- (k) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, and are not subject to 326 IAC 20-6.

- (l) Cleaners and solvents characterized as having a vapor pressure less than or equal to two (2.0) kilo Pascals measured at thirty-eight (38) degrees Centigrade.
- (m) Activities associated with the treatment of wastewater streams with oil and grease content less than or equal to one percent (1%) by volume.

Enforcement Issues

General Devices Co., Inc. was issued a Certificate of Operation No. 5071 on March 18, 1989, for a spray paint booth and a paint dip tank and has received no approvals since. On October 4, 2004, IDEM, OAQ received an application from General Devices Co., Inc. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the operating permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	76.21
PM10 ⁽¹⁾	76.24
PM2.5	76.24
SO ₂	0.04
NO _x	6.53
VOC	7.63
CO	5.49

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Benzene	negl.
Cadmium	negl.
Chromium	0.09
Dichlorobenzene	negl.
Formaldehyde	0.02
Glycol Ethers	0.43
Hexane	0.13
Lead	negl.
Manganese	0.07
Nickel	0.01
Toluene	negl.
Zinc	3.93

TOTAL HAPs	4.65
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- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM10 and PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A New Source Review and Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP
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The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM*	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
P2W	0.12	0.12	0.12	0.00	0.00	0.00	0.00	0.01	0.01 - manganese
P3W	0.24	0.24	0.24	0.00	0.00	0.00	0.00	0.15	0.09 - chromium
Sanding 1	45.05**	45.05**	45.05**	0.00	0.00	0.00	0.00	0.00	0.00
Sand Blast 1	2.41	2.08	2.08	0.00	0.00	0.00	0.00	0.00	0.00
Plant 1 Boiler	0.02	0.08	0.08	0.01	1.10	0.06	0.93	0.02	0.02 - hexane
Plant 1 Oven	0.01	0.04	0.04	0.00	0.50	0.03	0.42	0.01	0.01 - hexane
Plant 2 Boiler 1	0.01	0.03	0.03	0.00	0.34	0.02	0.28	0.01	0.01 - hexane
Plant 2 Boiler 2	0.01	0.03	0.03	0.00	0.34	0.02	0.28	0.01	0.01 - hexane
Plant 2 Oven 1	0.02	0.08	0.08	0.01	1.10	0.06	0.92	0.02	0.02 - hexane
Plant 2 Oven 2	0.02	0.08	0.08	0.01	1.10	0.06	0.92	0.02	0.02 - hexane
Plant 2 Burn-Off	0.00	0.01	0.01	0.00	0.15	0.01	0.13	0.00	0.00
Plant 3 Furnace 1	0.02	0.07	0.07	0.01	0.95	0.05	0.80	0.02	0.02 - hexane
Plant 3 Furnace 2	0.02	0.07	0.07	0.01	0.95	0.05	0.80	0.02	0.02 - hexane
Plant 1 Coating Line	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Plant 2 Coating Line 1	20.87**	20.87**	20.87**	0.00	0.00	0.00	0.00	0.00	0.00
Plant 2 Coating Line 2	7.17**	7.17**	7.17**	0.00	0.00	7.27	0.00	0.44	0.43 - glycol ethers
Cleanup	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Zinc Plating	0.22	0.22	0.22	0.00	0.00	0.00	0.00	3.93	3.93 - Zinc
Chrome Plating	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	76.21	76.24	76.2	0.04	6.53	7.63	5.49	4.65	3.93 - Zinc
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** This table indicates PTE before control, however, particulate emission limits exist pursuant to 326 IAC 6-3.									

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since all of the boilers at the source have a maximum heat input capacity of less than the 10 MMBtu/hr threshold.
- (b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit, since the VOC and HAP storage containers are each less than the 75 cubic meters in volume.
- (c) This source is subject to the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR 60, Subpart EE), because the source's primary function is to coat metal office furniture and the source uses greater than 3.842 gallons per year of coating.

The following units are subject to this rule:

One (1) booth for applying surface coatings to metal office furniture, identified as Plant 2 Coating Line 2, constructed in 2007, with a maximum capacity of 30 units per hour, applying powder coatings or spray coatings, using electrodeposition methods or HVLP spray application methods, with particulate emissions controlled by dry filters, exhausting to stack SB4. This is an affected source under NSPS, Subpart EE.

Applicable portions of the NSPS are the following:

- (1) 40 CFR 60.310(a),(b)
- (2) 40 CFR 60.311
- (3) 40 CFR 60.312
- (4) 40 CFR 60.313(b),(c)(1)
- (5) 40 CFR 60.315(a)(1),(2)
- (6) 40 CFR 60.315(b),(d)
- (7) 40 CFR 60.316(a),(b),(c),(d)

Nonapplicable portions of the NSPS will not be included in the permit.

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the source except as otherwise specified in 40 CFR 60, Subpart EE.

- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks 940 CFR 63.34, Subpart N), are not included in the permit, since the chromium tanks are neither electroplating nor anodizing.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)

for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.388, Subpart MMMM), are not included in the permit, since the source is not a major source of HAPs.

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63.1116, Subpart HHHHHH), are not included in the permit, since the coatings used do not contain target HAPs (chromium, lead, manganese, nickel, and cadmium).
- (h) The zinc electroplating tank and chromium electroless plating tanks are subject to the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations for (40 CFR 63.1150, Subpart WWWWWW), because the tanks use metal HAPs to coat materials.

The units subject to this rule include the following:

- (1) One (1) zinc electroplating tank, identified as ZT1, modified in 2009, with a maximum capacity of 80 units per hour, using a sodium hydroxide bath. This is an affected unit under NESHAP, Subpart WWWWWW.
- (2) Two (2) chromium non-electric dip coating tanks, identified as CT1 and CT2, modified in 2009, with a maximum capacity of 80 units per hour, each. These are affected units under NESHAP, Subpart WWWWWW.

Applicable portions of the NSPS are the following:

- (1) 40 CFR 63.11504 (a)(1)(i)(ii)
- (2) 40 CFR 63.11504 (a)(2)-(3)
- (3) 40 CFR 63.11505 (a)(1)
- (4) 40 CFR 63.11505 (c)-(e)
- (5) 40 CFR 63.11506 (a)
- (6) 40 CFR 63.11507 (a)-(d)
- (7) 40 CFR 63.11507 (g)
- (8) 40 CFR 63.11508 (a)-(d)
- (9) 40 CFR 63.11510
- (10) 40 CFR 63.11511

Nonapplicable portions of the NESHAP will not be included in the permit.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the zinc tank and chromium tanks except as otherwise specified in 40 CFR 63, Subpart WWWWWW.

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11, Subpart XXXXXX, are not included in the permit because the source's SIC code (2522) is not included in the EPA source category list for the nine metal fabrication and finishing source categories.
- (i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (j) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (h) 326 IAC 6.5 (Particulate Matter Emission Limitations Except Lake County)
The source is not specifically listed in 326 IAC 6.5-6, the potential to emit particulate matter from the source is less than 100 tons per year, and the actual particulate emission from the source are less than 10 tons per year, therefore, the requirements of 326 IAC 6.5 do not apply.
- (i) 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The source is not specifically listed in 326 IAC 7-4-2 and the potential to emit SO₂ from the source is less than 25 tons per year and less than 10 pounds per hour, therefore the requirements of 326 IAC 7-1.1-2 do not apply.

- (j) 326 IAC 9 (Carbon Monoxide Emission Rules)
The source does not perform any of the activities listed in 326 IAC 9-1-2, therefore the requirements of 326 IAC 9 do not apply.
- (k) 326 IAC 10 (Nitrogen Oxide Rules)
The source is not located in Clark or Floyd Counties and is not of any of the specific source categories listed, therefore the requirements of 326 IAC 10 do not apply.

Welding Operations (P2W, P3W)

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because each unit uses less than 625 pounds of wire per day.

Grinding and Sanding Operation (Sanding 1)

- (m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e)(1), the particulate matter (PM) from the grinding and sanding operations shall not exceed 1.20 pounds per hour when operating at a process weight rate of 320 tons per hour. The pound per hour limitation was calculated with the following equation:

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:

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

The dust collector shall be in operation at all times the grinding and sanding operation is in operation, in order to comply with this limit.

Abrasive Blasting (Sand Blast 1)

- (n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Sand Blast 1 is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Plant 1 Boiler

- (o) 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4, the particulate emissions from the Plant 1 Boiler, constructed in 1990, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the emissions limit calculated by the following equation:

If $Q < 10$ MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu

where Pt = Pounds of particulate matter emitted per million Btu(lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in million Btu per hour
(MM Btu/hr) heat input, $2.52 + 0.77 + 0.77 = 4.1$ MMBtu

The calculated limit is 0.6 lb/MMBtu. Based on the calculations in Appendix A of this TSD, the source is able to comply with the requirements of 326 IAC 6-2-4.

Plant 1 Oven

- (p) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Plant 1 Oven is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Plant 2 Boiler 1

- (q) 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4, the particulate emissions from the Plant 2 Boiler 1, constructed in 1990, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the emissions limit calculated by the following equation:

If $Q < 10$ MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu

where Pt = Pounds of particulate matter emitted per million Btu(lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in million Btu per hour
(MM Btu/hr) heat input, $2.52 + 0.77 + 0.77 = 4.1$ MMBtu

The calculated limit is 0.6 lb/MMBtu. Based on the calculations in Appendix A of this TSD, the source is able to comply with the requirements of 326 IAC 6-2-4.

Plant 2 Boiler 2

- (r) 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4, the particulate emissions from the Plant 2 Boiler 2, constructed in 1990, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the emissions limit calculated by the following equation:

If $Q < 10$ MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu

where Pt = Pounds of particulate matter emitted per million Btu(lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in million Btu per hour
(MM Btu/hr) heat input, $2.52 + 0.77 + 0.77 = 4.1$ MMBtu

The calculated limit is 0.6 lb/MMBtu. Based on the calculations in Appendix A of this TSD, the source is able to comply with the requirements of 326 IAC 6-2-4.

Plant 2 Oven 1

- (s) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Plant 2 Oven 1 is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Plant 2 Oven 2

- (t) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Plant 2 Oven 2 is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Plant 2 Burn-Off

- (u) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), Plant 2 Burn-Off is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Plant 3 Furnace 1

- (v) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Plant 3 Furnace 1 is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Plant 3 Furnace 2

- (w) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Plant 3 Furnace 2 is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Plant 1 Coating Line

- (x) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Plant 1 Coating Line is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.
- (y) 326 IAC 8-2-6 (VOC Requirements for Metal Furniture Coating)
Although Plant 1 Coating Line coats metal furniture, was constructed after July 1 1990, and is located in Marion County, actual VOC emissions are less than 15 pounds per day, therefore, the requirements of 326 IAC 8-2-6 do not apply.

Plant 2 Coating Line 1

- (z) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate emissions from Plant 2 Coating Line 1 shall be controlled by a dry filter, waterwash, or an equivalent control device. The control device shall be operated in accordance with the manufacturer's specification.

If overspray is visibly detected at the exhaust of accumulates on the ground the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such an observation:

- (1) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visible detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (aa) 326 IAC 8-2-6 (VOC Requirements for Metal Furniture Coating)
Although Plant 2 Coating Line 1 coats metal furniture, was constructed after July 1 1990, and is located in Marion County, actual VOC emissions are less than 15 pounds per day, therefore, the requirements of 326 IAC 8-2-6 do not apply.
- (bb) No other Article 8 rules apply.

Plant 2 Coating Line 2

- (cc) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate emissions from Plant 2 Coating Line 2 shall be controlled by a dry filter, waterwash, or an equivalent control device. The control device shall be operated in accordance with the manufacturer's specification.

If overspray is visibly detected at the exhaust or accumulates on the ground the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such an observation:

- (1) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visible detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (dd) 326 IAC 8-2-6 (VOC Requirements for Metal Furniture Coating)
Although Plant 2 Coating Line 2 coats metal furniture, was constructed after July 1 1990, and is located in Marion County, actual VOC emissions are less than 15 pounds per day, currently operating at eight hours per day, therefore, the requirements of 326 IAC 8-2-6 do not apply. Since the source only coats metal furniture for a portion of the time, the below condition will only apply when coating metal furniture.

Plant 2 Coating Line 2 shall use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit makes 326 IAC 8-2-6 (VOC requirements for Metal Furniture Coating) not applicable.

- (ee) No other Article 8 rules apply.

Zinc Electroplating (ZT1)

- (ff) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), ZT1 is exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour.

Chrome Non-electric Plating (CT1 and CT2)

- (gg) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), CT1 and CT2 are exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate is less than 0.551 pounds per hour, each.

Compliance Determination, Monitoring and Testing Requirements
--

Emission Unit/Control	Operating Parameters	Frequency
Plant 2 Coating Line 2	Record Keeping and Reporting (VOC)	Once Per Quarter

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 4, 2004 and additional information was received on May 7, 2007.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 097-19663-00233. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jillian Bertram at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

**Appendix A: Emissions Calculations
Welding (P2W, P3W)**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
P2W (MIG)	1	5	0.0055	0.0005			0.028	0.003	0.000	0.000	0.003
P3W (SMAW)	1	5	0.0108	0.00252	0.00043	0.00393	0.054	0.013	0.002	0.020	0.034
EMISSION TOTALS											
Potential Emissions lbs/hr							0.08	0.02	0.00	0.02	0.04
Potential Emissions lbs/day							1.96	0.36	0.05	0.47	0.89
Potential Emissions tons/year							0.36	0.07	0.01	0.09	0.16

METHODOLOGY

*Emission Factors are for the specific electrode type is noted in the Process column.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations
Grinding and Sanding (Sanding 1)**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Outlet Grain Loading Rate:	0.03	g/acf
Airflow:	4000	acfm
Efficiency:	90	%
Controlled Particulate Emissions:	4.51	tons/yr
Uncontrolled Particulate Emissions:	45.05	tons/yr

METHODOLOGY

Controlled Emissions = Outlet Grain Loading Rate (g/acf) * Airflow (acfm) * 60 min/hr * 1 lb/7000 g * 8760 hr/yr * 1ton/2000 lb
 Untonrolled Emisissions = Controlled Emissions (tons/yr) * (1-Control Efficiency (%))

Appendix A: Emission Calculations
Abrasive Blasting - Confined (Sand Blast 1)
Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	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 oxides	160
Sand	99
Steel	487

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

Internal diameter, in	Nozzle Pressure (psig)							
	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 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

28
487
99
0.125
0.13

Flow Rate (FR) (lb/hr) = 137.737 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

PM
0.004
137.737
0 %
1

	PM	PM10
Uncontrolled Emissions =	0.55	0.47 lb/hr
	2.41	2.08 ton/yr

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)

PM10 Emissions = PM Emissions * 0.86

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 1 Boiler**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.5

22.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.1	0.1	0.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 Plant 1 Boiler
 HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.318E-05	1.325E-05	8.278E-04	1.987E-02	3.753E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.519E-06	1.214E-05	1.545E-05	4.194E-06	2.318E-05

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 1 Oven**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.2

10.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.0	0.0	0.5	0.0	0.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 1 Oven
HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.058E-05	6.044E-06	3.778E-04	9.067E-03	1.713E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.519E-06	5.541E-06	7.052E-06	1.914E-06	1.058E-05

Methodology is the same as page 6.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 2 Boiler 1**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.8

6.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.0	0.0	0.3	0.0	0.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 9 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 Plant 2 Boiler 1
 HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.036E-06	4.021E-06	2.513E-04	6.031E-03	1.139E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.675E-06	3.686E-06	4.691E-06	1.273E-06	7.036E-06

Methodology is the same as page 8.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 2 Boiler 2**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.8

6.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.0	0.0	0.3	0.0	0.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 11 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 Plant 2 Boiler 2
 HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.036E-06	4.021E-06	2.513E-04	6.031E-03	1.139E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.675E-06	3.686E-06	4.691E-06	1.273E-06	7.036E-06

Methodology is the same as page 10.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 2 Oven 1**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.5

21.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.1	0.1	0.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 13 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 2 Oven 1
HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.300E-05	1.314E-05	8.213E-04	1.971E-02	3.723E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.475E-06	1.205E-05	1.533E-05	4.161E-06	2.300E-05

Methodology is the same as page 12.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 2 Oven 2**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.5

21.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.1	0.1	0.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 15 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 Plant 2 Oven 2
 HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.300E-05	1.314E-05	8.213E-04	1.971E-02	3.723E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.475E-06	1.205E-05	1.533E-05	4.161E-06	2.300E-05

Methodology is the same as page 14.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 2 Burn-Off**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.4

3.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.0	0.0	0.2	0.0	0.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 17 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 Plant 2 Burn-Off
 HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.219E-06	1.840E-06	1.150E-04	2.759E-03	5.212E-06

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.665E-07	1.686E-06	2.146E-06	5.825E-07	3.219E-06

Methodology is the same as page 16.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 3 Furnace 1**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.2

19.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.0	0.1	0.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 19 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 Plant 3 Furnace 1
 HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.005E-05	1.146E-05	7.161E-04	1.719E-02	3.246E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.774E-06	1.050E-05	1.337E-05	3.628E-06	2.005E-05

Methodology is the same as page 18.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Plant 3 Furnace 2**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.2

19.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.0	0.1	0.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 21 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 Plant 3 Furnace 2
 HAPs Emissions**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.005E-05	1.146E-05	7.161E-04	1.719E-02	3.246E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.774E-06	1.050E-05	1.337E-05	3.628E-06	2.005E-05

Methodology is the same as page 20.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Permit Reviewer: Jillian Bertram
Date: 5/22/2009

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyd	Weight % Glycol Ethers	Formaldehyde Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total HAP (ton/yr)
Plant 1 Coating Line								
Poxylube	9.2	0.00300	80.000	0.00%	0.00%	0.00	0.00	0.00
Plant 2 Coating Line 1								
Powder Coat	10.6	0.05000	30.000	0.00%	0.00%	0.00	0.00	0.00
Plant 2 Coating Line 2								
Eastern Chem-Lac	8.9	0.05000	30.000	0.02%	0.73%	0.01	0.43	0.44
Cleanup Solvent								
Acetone	6.7	0.00050	40.000	0.00%	0.00%	0.00	0.00	0.00

METHODOLOGY

Total State Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Zinc Electroplating (ZT1)**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Permit Reviewer: Jillian Bertram
Date: 5/22/2009

Zinc Emissions

Equation from AP-42 Section 12.20

$$E_{fm} = (3.3 \times 10^{-7}) \cdot (EEm/em) \cdot (Cm) \cdot (Dm) \cdot Q$$

Variable	Value	Explanation
EEm =	0.3322	Electrochemical equivalent for metal "m", A-hr/mil-ft ² (from R023-16752-00029, issued July 29, 2003)
em =	95%	Range 90%-98%, 95% normal (from R023-16752-00029, issued July 29, 2003)
Cm =	1.8	Bath concentration for metal "m" oz/gal, provided by source
Dm =	30	Current density for metal "m" A/ft ² , provided by source
Efm =	6.23137E-06	Emission Factor for metal "m" grains/dscf
Q =	2400	Flow Rate for metal "m" emissions dscfm, provided by source

**Zinc
Emissions
(tons/yr)**

3.93

Particulate Emissions

Emission Factor from National Pollution Inventory Emission Estimation Technique Manual for Electroplating and Anodising, July 1999

Efp(m) =	0.003	Emission Factor for Particulate (based on zinc bath), kg/m ²
EFp =	0.001	Emission Factor Converted to Standard Units, lb/ft ²
V =	80	Volume of Parts Coated per hour ft ² /hr, provided by source
PM =	0.05	Emissions in lb/hr
PM =	0.22	Emissions in tons/yr

**Appendix A: Emission Calculations
Non-Electro Chromium Plating**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Permit Reviewer: Jillian Bertram
Date: 5/22/2009

Particulate Emissions

Equation from AP-42 Section 12.20

$$E2 = 1.9 * \sigma / Rb [(1 - 2a + 9a^2)^{0.5} + (a - 1) / (1 + 3a) - (1 - 2a + 9a^2)^{0.5}]^{0.5}$$

Variable	Value	Explanation
Rb =	0	Average bubble radius, in, provided by source
a =	0	$0.072 * Rb^2 / \sigma$
E2 =	0	Emission factor for particulate g/dscf
Q =	2400	Flow Rate, dscfm, provided by source
PM =	0	Emissions in tons/yr

* Since this process uses dip coating, there are no bubbles, therefore $a=0$ and $PM \text{ (tons/yr)} = 0$

**Appendix A: Emissions Calculations
Source-Wide Summary**

Company Name: General Devices Co., Inc.
Address City IN Zip: 1410 South Post Road, Indianapolis, IN 46239
Permit Number: 097-19663-00233
Reviewer: Jillian Bertram
Date: 5/22/2009

Emission Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Total HAP (tons/yr)
P2W	0.12	0.12	0.00	0.00	0.00	0.00	0.01 - manganese	0.01
P3W	0.24	0.24	0.00	0.00	0.00	0.00	0.09 - chromium	0.15
Sanding 1	45.05	45.05	0.00	0.00	0.00	0.00	0.00	0.00
Sand Blast 1	2.41	2.08	0.00	0.00	0.00	0.00	0.00	0.00
Plant 1 Boiler	0.02	0.08	0.01	1.10	0.06	0.93	0.02 - hexane	0.02
Plant 1 Oven	0.01	0.04	0.00	0.50	0.03	0.42	0.01 - hexane	0.01
Plant 2 Boiler 1	0.01	0.03	0.00	0.34	0.02	0.28	0.01 - hexane	0.01
Plant 2 Boiler 2	0.01	0.03	0.00	0.34	0.02	0.28	0.01 - hexane	0.01
Plant 2 Oven 1	0.02	0.08	0.01	1.10	0.06	0.92	0.02 - hexane	0.02
Plant 2 Oven 2	0.02	0.08	0.01	1.10	0.06	0.92	0.02 - hexane	0.02
Plant 2 Burn-Off	0.00	0.01	0.00	0.15	0.01	0.13	0.00	0.00
Plant 3 Furnace 1	0.02	0.07	0.01	0.95	0.05	0.80	0.02 - hexane	0.02
Plant 3 Furnace 2	0.02	0.07	0.01	0.95	0.05	0.80	0.02 - hexane	0.02
Plant 1 Coating Line	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Plant 2 Coating Line 1	20.87	20.87	0.00	0.00	0.00	0.00	0.00	0.00
Plant 2 Coating Line 2	7.17	7.17	0.00	0.00	7.27	0.00	0.43 - glycol ethers	0.44
Cleanup	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Zinc Plating	0.22	0.22	0.00	0.00	0.00	0.00	3.93 - Zinc	3.93
Chrome Plating	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	76.21	76.24	0.04	6.53	7.63	5.49	3.93 - Zinc	4.65



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Rick Reeves
General Devices Co.
1410 S. Post Road
Indianapolis, IN 46239

DATE: August 31, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
New Construction MSOP
097 - 19663 - 00233

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

August 31, 2009

TO: Warren Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: General Devices Co.
Permit Number: 097 - 19663 - 00233

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	LPOGOST 8/31/2009 General Devices Co., Inc 097 - 19663 - 00233 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
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1		Rick Reeves General Devices Co., Inc 1410 S. Post Road Indianapolis IN 46239 (Source CAATS) Via confirmed delivery										
2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Ms. Janet McCabe Improving Kids Environment 3951 N Meridian Street Suite 160 Indianapolis IN 46208-4062 (Affected Party)										
7		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
8		Warren Library 9701 E 21st Street Indianapolis IN 46229 (Library)										
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