

April 22, 2005

Mr. Russell Eiler
Environmental Manager
IR Von Duprin
2720 Tobey Drive
Indianapolis, IN 46219

CERTIFIED MAIL 7000 0600 0023 5190 5297

RE: First Significant Permit Revision **097-20272-00050** to FESOP 097-16154-00050

Dear Mr. Eiler:

IR Von Duprin was issued a FESOP Renewal, F097-16154-00050 on September 22, 2003 relating to the operation of surface coating of miscellaneous metal parts, decorative chromium electroplating and metal trimming and stamping of architectural hardware products. A First Administrative Amendment, 097-19128-00050 was issued on August 6, 2004. An application to modify the source was received on October 14, 2004 with additional information received on January 18, 2005 requesting to:

- (a) replace the insignificant activity Kolene Molten Salt Paint Stripping Bath for stripping paint racks, identified as ID CU-9, with two (2) insignificant activity paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15;
- (b) change the frequency of dry filter inspections in Condition D.1.7(a) to verify the placement, integrity and particle loading of the filters from once per shift to once per day; and
- (c) amend the emission standard (Condition D.2.3(b)) and compliance monitoring provision (Condition D.2.8) of 45 dynes per centimeter to 35 dynes per centimeter, per the Federal Register Notice of July 19, 2004, for decorative chromium electroplating sources when using a tensiometer as the means for testing the surface tension of chromium electroplating tanks.
- (d) amend two Insignificant Activity equipment descriptions, PU-4 and PU-8, and amend Condition D.4.3 to include the allowable particulate emission limit, pursuant to 326 IAC 6-3-2, for PU-6A because the process weight rate for PU-6A exceeds one hundred pounds per hour.

Pursuant to 326 IAC 2-8-11.1(f), the following changes were made to the permit by this First Significant Permit Revision, 097-20272-00050 (additions are in boldface type and deletions are in strikeout).

Change 1

The replacement of the Kolene Molten Salt Paint Stripping Bath for stripping paint racks with two paint burn off ovens causes the Insignificant Activity list in Condition A.3 (Insignificant Activities) to be revised as follows:

- (r) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).
- (7) ~~Kolene Molten Salt Paint Stripping Bath for stripping paint racks, identified as ID CU-9. This unit is also equipped with natural gas fired burner system with maximum heat input rate of 1.8 million Btu per hour.~~

Two (2) paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15. Installed in 2005. [326 IAC 4-2] [326 IAC 9]

Change 2

The replacement of the Kolene Molten Salt Paint Stripping Bath for stripping paint racks with two paint burn off ovens causes the description box of Insignificant Activities listed in Section D.4 (Insignificant Activities) to be revised as follows:

- (e) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).
- (7) ~~Kolene Molten Salt Paint Stripping Bath for stripping paint racks, identified as ID CU-9. This unit is also equipped with natural gas fired burner system with maximum heat input rate of 1.8 million Btu per hour.~~

Two (2) paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15. Installed in 2005. [326 IAC 4-2] [326 IAC 9]

Change 3

The two (2) paint rack burn off ovens are defined as incinerators and are, therefore, each subject to 326 IAC 4-2 (Incinerators) and 326 IAC 9 (Carbon Monoxide Emission Rules). Pursuant to 326 IAC 2-8-11.1(g), any modifications that trigger any new applicable requirements shall be processed as a Significant Permit Revision. Therefore, these two (2) new applicable requirements are now added as Condition D.4.5 and D.4.6 with the subsequent renumbering of existing Condition D.4.5 Particulate Control to reflect the additions as follows:

D.4.5 Incinerators [326 IAC 4-2]

Pursuant to 326 IAC 4-2, Oven CU-13 and Oven CU-14 shall each:

- (a) **consist of primary and secondary chambers or the equivalent;**

- (b) be equipped with a primary burner;
- (c) comply with 326 IAC 5-1 and 326 IAC 2;
- (d) be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan approved by the Commissioner;
- (e) not emit particulate matter in excess of:
 - (1) five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air;
- (f) if any of the above requirements (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (g) The incinerator is exempt from requirement (e) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

D.4.6 Carbon Monoxide Emission Rules [326 IAC 9]

Pursuant to 326 IAC 9, emission of carbon monoxide from Oven CU-13 and Oven CU-14 shall each be limited to the following:

- (a) Refuse incineration and refuse burning equipment: the Permittee shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in one (1) of the following:
 - (1) Direct-flame afterburner.
 - (2) Secondary chamber.

D.4.57 Particulate Control

In order to comply with Conditions D.4.3 and D.4.4, the cartridge dust collectors for polishing units PU-1, PU-4, PU-6A, PU-8 and PU-3 for PM and PM10 control shall be in operation at all times that the each polishing facility is in operation.

Change 4

The change in the frequency of dry filter inspections in Condition D.1.7(a) to verify the placement, integrity and particle loading of the filters from once per shift to once per day also requires a change in the record keeping Condition D.1.8(b) and is as follows:

D.1.7 Monitoring

- (a) **Daily** ~~Once per shift~~ inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (SV25) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.8 Record Keeping Requirements

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, ~~daily once per shift~~ and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Change 5

Per the Federal Register Notice of July 19, 2004 (69 FR 42885), for decorative chromium electroplating sources using a tensiometer as the means for testing the surface tension of chromium electroplating tanks, Condition D.2.3(b) and Condition D.2.8 are revised from 45 dynes per centimeter to 35 dynes per centimeter as well as a new Condition D.2.3(b)(3) to reflect the current State rule 326 IAC 20-8-1 as follows:

D.2.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)] **[69 FR 42885]** **[326 IAC 20-8-1]**

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks #20 and #58 by:
- (1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4×10^{-6} gr/dscf)]; or
 - (2) **Pursuant to 69 FR 42885, not** allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] **when using a stalagmometer to measure surface tension and thirty-five dynes per centimeter (35 dynes/cm) [equivalent to two and four-tenths times ten raised to the power of negative three pound-force per foot (2.4×10^{-3} lb_f/ft)] when using a tensiometer to measure surface tension** at any time during operation of tanks 20 and 58 when a chemical fume suppressant containing a wetting agent is used.
 - (3) **Pursuant to 326 IAC 20-8-1, not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] at any time during operation of tanks #20 and #58 when a chemical fume suppressant containing a wetting agent is used.**

D.2.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)] [40 CFR 63.343(c)] **[69 FR 42885]**

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the electroplating bath to comply with the limit specified in Condition D.2.3, the Permittee

shall monitor the surface tension of the electroplating baths. Operation of tanks #20 and # 58 at a surface tension greater than 45 dynes per centimeter **when using a stalagmometer to measure surface tension or greater than 35 dynes per centimeter when using a tensiometer to measure surface tension** shall constitute noncompliance with the standards.

Change 6

The reference to 45 dynes per centimeter was also stated in the equipment description in Condition A.2 and in the description box in Section D.2. Per the Federal Register Notice of July 19, 2004 (69 FR 42885), for decorative chromium electroplating sources using a tensiometer as the means for testing the surface tension of chromium electroplating tanks, Condition A.2(b) and (c) and the description box in Section D.2 are revised from 45 dynes per centimeter to 35 dynes per centimeter when using a tensiometer as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (b) One (1) Single Hoist Line decorative chromium electroplating line, identified as ID SHL-5, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 20, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, **at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension** ~~at any time during operation of the tank.~~ Additionally, tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 5.
- (c) One (1) Dual Hoist Line decorative chromium electroplating line, identified as ID DHL-13, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 58, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, **at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension** ~~at any time during operation of the tank.~~ Additionally, tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 16.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(b) One (1) Single Hoist Line decorative chromium electroplating line, identified as ID SHL-5, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 20, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, **at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension** ~~at any time during operation of the tank.~~ Additionally, tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 5.

(c) One (1) Dual Hoist Line decorative chromium electroplating line, identified as ID DHL-13, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 58, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, **at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension** ~~at any time during operation of the tank.~~ Additionally, tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 16.

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

Change 7

The reference to 45 dynes per centimeter was also stated in the Ongoing Compliance Status Report form that appeared on page 46 of 49 of the First Administrative Amendment 097-19128-00050, issued on August 6, 2004. Per the Federal Register Notice of July 19, 2004 (69 FR 42885), for decorative chromium electroplating sources using a tensiometer as the means for testing the surface tension of chromium electroplating tanks, the Ongoing Compliance Status Report form is revised from 45 dynes per centimeter to 35 dynes per centimeter as follows:

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

**FESOP CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
ONGOING COMPLIANCE STATUS REPORT**

Source Name: IR Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
FESOP No.: 097-16154-00050
Tank ID #: _____
Type of process: Decorative
Monitoring Parameter: Surface tension of the electroplating or anodizing bath
Parameter Value: 45 dynes per centimeter **when using a stalagmometer to measure surface tension; 35 dynes per centimeter when using a tensiometer to measure surface tension.**

Limits: Total chromium concentration may not exceed 0.01 mg/dscm

Change 8

The Permittee has made an application to replace emission units at the source, specifically, two insignificant activity paint rack burn off ovens are to be installed and replace the existing Kolene Molten Salt Paint Stripping Bath. The Permittee is seeking approval to modify the existing FESOP, F097-16154-00050, pursuant to 326 IAC 2-8-11.1. Therefore, Condition B.23 (Advanced Source Modification Approval) is added as follows:

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) **The requirements to obtain a permit revision under 326 IAC 2-8-11.1 is satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Section A.3.**
- (b) **Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.**

Change 9

The addition of Condition B.23 (Advanced Source Modification Approval) requires that the 3rd paragraph of the Title page be amended as follows:

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. **This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.**

Change 10

The additional information received from the source on January 18, 2005 identified descriptive corrections to individual polishing units at Insignificant Activity polishing stations, PU-4, PU-6A and PU-8. These corrections had been requested by the source to be made for the First Administrative Amendment, F097-19128-00050, issued August 6, 2004 but were inadvertently not incorporated in to the issuance. The corrections to the Insignificant Activity emission units do not increase emissions to greater than any Insignificant Activity emission threshold. In addition, the First Administrative Amendment, F097-19128-00050, issued August 6, 2004, established an additional and conflicting allowable particulate emission rate pursuant to 326 IAC 6-3-2 for polishing station PU-8 as Condition D.4.4(g).

IR Von Duprin submitted public notice period comments on March 28, 2005 requesting to delete two (2) hand polisher workstations or units (one hand lathe) from Emission Unit ID PU-6B for polishing miscellaneous metal parts. This unit will be replaced with one (1) Robotic Polishing Unit currently identified in PU-1 for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing, approximately, 0.309 pounds. The two (2) Hand Polisher Work Station Units in PU-1 will continue to be referenced as PU-1 and the robotic polishing unit will be absorbed into the PU-6B emission unit. The requested changes effect the emission unit descriptions in Condition A.2(d), A.3(r)(3), and in the description boxes in Section D.3 and Section D.4.

The deletion of two (2) hand polisher workstations from PU-6B along with moving the existing one (1) Robotic Polishing Unit from PU-1 to PU-6B does change the process weight rate and particulate emission rate for PU-6B, established pursuant to 326 IAC 6-3-2 and in Condition D.3.1 (Particulate). As a result, the process weight rate in Condition D.3.1 for PU-6B is now changed from 440.16 pounds per hour to 418.0 pounds per hour. Pursuant to 326 IAC 6-3-2, the particulate emission rate in Condition D.3.1 is changed from 1.49 pounds per hour to 1.44 pounds per hour based on the allowable particulate emission rate calculation from 326 IAC 6-3-2 for a process weight rate of 418.0 pounds per hour ($4.10 \times (418/2000)^{0.67} = 1.44$ pounds PM per hour). The change in the type of polishing units that PU-6B consists of also causes a change in Condition D.3.3 (Particulate Control).

The removal of the one (1) Robotic Polishing Unit from PU-1 does not effect the particulate emission rate, established pursuant to 326 IAC 6-3-2, and stated in Condition D.4.4, because the process weight rate for PU-1 was already less than one hundred (100) pounds per hour before the removal of the Unit from PU-1. However, the one (1) Robotic Polishing Unit previously operating as PU-1 was specifically identified in Condition D.4.4(c)(A) and is now deleted from Condition D.4.4(c).

Therefore, revisions to Condition A.2(d), Condition A.3(r)(2)(A) & (B), Condition A.3(r)(3), Condition A.3(r)(5), the description boxes in Section D.3 and Section D.4, Condition D.3.1, Condition D.3.3, Condition D.4.3 and Condition D.4.4 are as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (d) One (1) polishing station, identified as PU-6B, consisting of **twenty six (26)** ~~twenty eight (28)~~ Hand Polisher Work Station Units for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift per work station unit, with each unit weighing approximately 0.524 pounds, **and one (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds**, and using a cartridge dust collector for particulate control identified as Stack ID 6B and exhausting inside the building. This polishing station was installed in 1986.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

- (r) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).
 - (2) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-8. This unit consists of:
 - (A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control identified as Stack ID ~~4~~ **8** and exhausting inside the building. Four (4) of the polishing units were installed in 1986 and two (2) remaining units, at an exemption level, were installed in 1998.
 - (B) One (1) **Buffing Robotic Polishing** Unit with a maximum capacity of ~~240~~ **220** units per eight hour shift with each unit weighing approximately

~~0.524~~ **0.95** pounds, using cartridge dust collector for particulate control identified as Stack ID ~~4 8~~ and exhausting inside the building. This unit was installed in ~~1986~~ **2002**.

- (3) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:
- (A) ~~One (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds.~~
- (B) ~~Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.~~
- (5) One (1) ~~Robotic Polishing~~ **Buffing** Unit identified as ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of ~~220~~ **240** units per eight hour shift with each unit weighing approximately ~~0.95~~ **0.524** pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID ~~8 4~~ and exhaust inside the building.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) One (1) polishing station, identified as PU-6B, consisting of **twenty six (26)** ~~twenty eight (28)~~ Hand Polisher Work Station Units for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift per work station unit, with each unit weighing approximately 0.524 pounds, **and one (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds** and using cartridge dust collector for particulate control identified as Stack ID 6B and exhausting inside the building. This polishing station was installed in 1986.

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the Hand **and Robotic** Polisher Work Station (PU-6B) shall not exceed **1.44** ~~1.49~~ pounds per hour when operating at a process weight rate of **418.0** ~~440.16~~ pounds per hour.

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

Interpolation of the data for the process weight rate up to 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.3.3 Particulate Control

In order to comply with Condition D.3.1, the cartridge dust collector for PM and PM10 control shall be in operation at all times that the Hand **and Robotic** Polisher Work Station (PU-6B) is in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities (continued)

- (B) One (1) Robotic Polishing Unit with a maximum capacity of 220 units per eight hour shift with each unit weighing approximately 0.95 pounds, using cartridge dust collector for particulate control identified as Stack ID 8 and exhausting inside the building. This unit was installed in 2002.

- (3) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:
 - (A) ~~One (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds.~~

 - (B) Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.

D.4.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the polishing station identified as PU-8 shall not exceed ~~0.62~~ ~~0.58~~ pounds per hour when operating at a process weight rate of ~~120.5~~ ~~110.04~~ pounds per hour. **Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the polishing station identified as PU-6A shall not exceed 0.58 pounds per hour when operating at a process weight rate of 110.0 pounds per hour.**

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

Interpolation of the data for the process weight rate up to 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.4.4 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), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- ~~(c) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-6A, using cartridge dust collector for particulate control identified as Stack ID 6A and exhausting inside the building. This unit consists of:~~

~~(A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds. Four (4) of the polishing units were installed in 1986, one (1) unit, at an exemption level, was installed in 1998, and one (1) unit will be installed in 2004.~~

~~(B) One (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds. This unit was installed in 2002.~~

- ~~(c)~~ (c) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:

~~(A) One (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds.~~

~~(B) Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.~~

- ~~(d)~~ (d) One (1) Robotic Polishing Unit identified as ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 200 units per eight hour shift with each unit weighing approximately 1.749 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 3 and exhaust inside the building.

- (f) (e) One (1) ~~Robotic Polishing~~ **Buffing** Unit identified as ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of ~~220~~ **240** units per eight hour shift with each unit weighing approximately ~~0.95~~ **0.524** pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID ~~8~~ **4** and exhaust inside the building.

- ~~(g) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-8. This unit consists of:~~

~~(A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control~~

~~identified as Stack ID 1 and exhausting inside the building. Four (4) of the polishing units were installed in 1986 and two (2) remaining units, at an exemption level, were installed in 1998.~~

~~(B) One (1) Buffing Unit with a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control identified as Stack ID 4 and exhausting inside the building. This unit was installed in 1986.~~

- (f) Powder coating operation for coating miscellaneous metal parts, consisting of three (3) spray booths, identified as PB-1, PB-2 and PB-3, with a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by a dust collector exhausting inside the building. This operation is also equipped with one (1) natural gas fired dry off oven identified as ID CU-10 with a maximum heat input rate of 1.0 million Btu per hour and exhausting through stack ID 22; and two (2) powder coating natural gas fired cure ovens identified as ID CU-11 and CU-12 each with a maximum heat input rate of 2.5 million Btu per hour and each exhausting through stacks ID 23 and 24, respectively.
- (g) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by cartridge dust collector and exhausting through stack ID PB-14. This operation is also equipped with one (1) natural gas fired cure oven identified as ID CU-7 with a maximum heat input rate of 0.8 million Btu per hour and exhausting through stack ID 14.

Change 11

All references to the mailing address of IDEM, OAQ throughout the FESOP have been revised to the new mail address as follows:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015 **46204**

Change 12

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into the permit as follows:

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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.

Change 13

Although there is a packed bed scrubber connected to the decorative chrome electroplating tanks, it is not used to demonstrate continuous compliance. As a result, whenever the packed bed scrubber is noted in the requirements, it should be stated that the requirement to operate the packed bed scrubber applies only if the packed bed scrubber is used to demonstrate continuous compliance. Therefore, in Condition D.2.4(a), D.2.6(a), D.2.7(c) and D.2.9(a), (b), (c) and (d), additional wording is needed to clearly state "to demonstrate continuous compliance" as follows:

D.2.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tanks #20 and #58:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks #20 and #58, including the chemical wetting agent, the packed bed scrubber **whenever being used to demonstrate continuous compliance**, and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.2.6.

D.2.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks #20 and #58. The OMP shall specify the operation and maintenance criteria for tanks #20 and #58, the chemical wetting agent, the packed bed scrubber if being used **to demonstrate continuous compliance**, and monitoring equipment **and** shall include the following elements:

D.2.7 Performance Testing [326 IAC 2-1.1-11] [326 IAC 2-8-5(a)(1)&(4)] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

- (a) A performance test demonstrating initial compliance for tanks #20 and # 58 was performed on January 30, 1996.

During the initial performance test conducted on January 30, 1996, it was determined that the total chromium concentration of each stack ID # 5 and 16, using Method 306, Appendix A of 40 CFR 63, was 0.0022 mg/dscm.

- (b) The Permittee is not required to further test tanks #20 and #58 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, or OES, compliance with the limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of tanks #20 and #58, the chemical wetting agent, the packed bed scrubber **when used to demonstrate continuous compliance**, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

D.2.9 Record Keeping Requirements [326 IAC 2-8-5(3)] [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.2.3, D.2.4 and D.2.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the chemical wetting agent, the packed bed scrubber system whenever being used **to demonstrate continuous compliance**, and monitoring equipment to document that the inspection and maintenance required by Conditions

D.2.7 and D.2.8 have taken place. The record can take the form of a checklist and should identify the following:

- (1) The device inspected;
 - (2) The date of inspection;
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks #20 and #58, the packed bed scrubber **whenever being used to demonstrate continuous compliance** and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks #20 and #58, the packed bed scrubber **whenever being used to demonstrate continuous compliance** and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks #20 and #58, the packed bed scrubber **whenever being used to demonstrate continuous compliance** and monitoring equipment as indicated by monitoring data collected in accordance with this condition.

Change 14:

Condition D.2.10(c) requires that an annual Ongoing Compliance Status report be prepared and maintained. In order to clarify when this report shall be completed, the following change is made to Condition D.2.10(c):

D.2.10 Reporting Requirements [326 IAC 2-8-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

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

- (c) Ongoing Compliance Status Report
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks #20 and #58 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks #20 and #58 are located at site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ, and OES, upon request.

- (1) The Ongoing Compliance Status Report shall be completed **within thirty (30) days from the date the report period ends and shall be completed** according to the following schedule except as provided in paragraph (c)(2).
 - (A) The first report shall cover the period from the issuance date of this permit to December 31 of the year in which the permit is issued.

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

Change 15

Marion County has been classified as nonattainment for PM2.5 (by U.S.EPA in Federal Register Notice 70 FR 943, effective April 5, 2005). Therefore, PM2.5 emissions were reviewed pursuant to the requirements for nonattainment new source review. There have been no modifications or revisions to this source that were major modifications for PM2.5 pursuant to nonattainment new source review requirements. This Significant Permit Revision, which adds the Insignificant Activity paint rack burn off ovens, Oven CU-13 and Oven CU-14, does not increase the potential to emit PM2.5 of this source such that the source is a major source, pursuant to nonattainment new source review requirements. Therefore, nonattainment new source review requirements for PM2.5 are not applicable to the source. However, a revised County Attainment status table and a revised Condition A.1 of SPR097-20272-00050, as of April 5, 2005, is as follows:

Pollutant	Status
PM-10	Unclassifiable
PM2.5	Nonattainment
SO ₂	Maintenance attainment
NO _x	Attainment
1-hour Ozone	Maintenance attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	unclassifiable

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source relating to the operation of surface coating of miscellaneous metal parts with powders, decorative chromium electroplating and metal trimming and stamping of architectural hardware products.

Authorized Individual: Environmental Manager
 Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 General Source Phone: (317) 613 8944
 SIC Code: 3442, 3446, 3469, 3471 and 3479
 County Location: Marion
 Source Location Status: Nonattainment for ozone under the 8-hour standard,
Nonattainment for PM2.5,
 Attainment for all other criteria pollutants
 Source Status: Federally Enforceable State Operating Permit (FESOP)
 Minor Source, under PSD Rules;
Minor Source, under Emission Offset
 Minor Source, Section 112 of the Clean Air Act

Change 16:

The signature box on the title page of SPR097-20272-00050 has changed as follows:

First Significant Permit Revision No.: 097-20272-00050	Conditions affected: Title Page; A.1 , A.2(b),(c) & (d); A.3(r)(2), (3),(5)&(7); B.23; B.24; C.14; D.1.4; D.1.7(a); D.1.8(b); D.2(b) & (c); D.2.3(b)(2) & (b)(3); D.2.4(a); D.2.6(a); D.2.7(c); D.2.8(a); D.2.9; D.2.10(c); D.3.1; D.3.3; D.4(e); D.4(e)(7); D.4.3; D.4.4; D.4.5; D.4.6; D.4.7; Ongoing Compliance Status Report form
---	---

Issued by: Felicia A. Robinson Manager of Environmental Planning John B. Chavez, Administrator Office of Environmental Services	Issuance Date:
--	----------------

All other conditions of the FESOP shall remain unchanged and in effect. Please find enclosed a copy of the entire FESOP with the revisions.

This decision is subject to the Indiana Administrative Orders and Procedures Act, IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Mark Caraher at (317) 327-2272.

Sincerely,

Original signed by:

Felicia A. Robinson
Manager of Environmental Planning
Administrator

Enclosure: Revised FESOP

Cc: files
Matt Mosier, OES Compliance
Mindy Hahn, IDEM, OAQ
Marion County Health Department
USEPA, Region 5



City of
Indianapolis
Bart Peterson, Mayor

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS, OFFICE OF ENVIRONMENTAL SERVICES**

**IR Von Duprin
2720 Tobey Drive
Indianapolis, Indiana 46219**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F097-16154-00050	
Issued by: Originally signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: 9-22-2003 Expiration Date: 9-22-2008
First Administrative Amendment: 097-19128-00050, issued on August 6, 2004	
First Significant Permit Revision No.: 097-20272-00050	Conditions affected: Title Page; A.2(b),(c) & (d); A.3(r)(2), (3),(5)&(7); B.23; B.24; C.14; D.1.4; D.1.7(a); D.1.8(b); D.2(b) & (c); D.2.3(b)(2) & (b)(3); D.2.4(a); D.2.6(a); D.2.7(c); D.2.8(a); D.2.9; D.2.10(c); D.3.1; D.3.3; D.4(e); D.4(e)(7); D.4.3; D.4.4; D.4.5; D.4.6; D.4.7; Ongoing Compliance Status Report form
Issued by: Original signed by: Felicia A. Robinson Manager of Environmental Planning Office of Environmental Services	Issuance Date: April 22, 2005

**Department of Public Works
Office of Environmental Services**
2700 South Belmont Avenue (317) 327-2234
Indianapolis, Indiana 46221 (fax) 327-2274
(TDD) 325-5186
www.indygov.org

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source relating to the operation of surface coating of miscellaneous metal parts with powders, decorative chromium electroplating and metal trimming and stamping of architectural hardware products.

Authorized Individual:	Environmental Manager
Source Address:	2720 Tobey Drive, Indianapolis, Indiana 46219
Mailing Address:	2720 Tobey Drive, Indianapolis, Indiana 46219
General Source Phone:	(317) 613 8944
SIC Code:	3442, 3446, 3469, 3471 and 3479
County Location:	Marion
Source Location Status:	Nonattainment for ozone under the 8-hour standard, Nonattainment for PM _{2.5} , Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules, Minor Source, under Emission Offset Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) F-Systems custom built solid lubricant application booth, identified as Emission Unit ID SL-01, for surface coating of miscellaneous metal parts with maximum coating capacity of 4.69 gallons of coating per hour, equipped with dry filters for particulate emissions control and exhausting through Stack ID SV25. There is also one (1) associated natural gas fired curing oven with heat input rate of 2.0 million Btu per hour (both constructed in 1998).
- (b) One (1) Single Hoist Line decorative chromium electroplating line, identified as ID SHL-5, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 20, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension. Additionally, tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 5.
- (c) One (1) Dual Hoist Line decorative chromium electroplating line, identified as ID DHL-13, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 58, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension. Additionally, tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 16.

- (d) One (1) polishing station, identified as PU-6B, consisting of twenty six (26) Hand Polisher Work Station Units for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift per work station unit, with each unit weighing approximately 0.524 pounds, and one (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds, and using a cartridge dust collector for particulate control identified as Stack ID 6B and exhausting inside the building. This polishing station was installed in 1986.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units (Btu) per hour consisting of:
 - (1) Orr and Sembower natural gas fired boiler, identified as ID CU-1, with a maximum heat input rate of 5.0 million Btu per hour (constructed in 1986).
 - (2) Dunham Bush natural gas fired boiler, identified as ID CU-2, with a maximum heat input rate of 5.0 million Btu per hour (constructed in 1986).
 - (3) One (1) natural gas fired cogeneration unit (generator/water heater), with a maximum heat input rate of 0.95 million Btu per hour (constructed in 2003).
 - (4) One natural gas fired 75 kW microturbine, with a maximum heat input rate of 0.95 million Btu per hour (constructed in 2003).
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (e) Cleaners and solvents usage, of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months and characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F); or
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68F).
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (g) Closed loop heating and cooling system.
- (h) Infrared cure equipment.
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (n) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (o) On site fire and emergency response training approved by the department.
- (p) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (q) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (r) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NOx, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).
 - (1) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-6A, using cartridge dust collector for particulate control identified as Stack ID 6A and exhausting inside the building. This unit consists of:
 - (A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds. Four (4) of the polishing units were installed in 1986, one (1) unit, at an exemption level, was installed in 1998, and one (1) unit will be installed in 2004.
 - (B) One (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds. This unit was installed in 2002.
 - (2) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-8. This unit consists of:
 - (A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control identified as Stack ID 8 and exhausting inside the building. Four (4) of the polishing units were installed in 1986 and two (2) remaining units, at an exemption level, were installed in 1998.
 - (B) One (1) Robotic Polishing Unit with a maximum capacity of 220 units per eight hour shift with each unit weighing approximately 0.95 pounds, using cartridge dust collector for particulate control identified as Stack ID 8 and exhausting inside the building. This unit was installed in 2002.
 - (3) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:
 - Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These

units will be installed in 2004.

- (4) One (1) Robotic Polishing Unit identified as ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 200 units per eight hour shift with each unit weighing approximately 1.749 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 3 and exhaust inside the building.
- (5) One (1) Buffing Unit identified as ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 4 and exhaust inside the building.
- (6) One (1) 500 gallon liquid caustic compound removal tank and one (1) 500 gallon de-ionized water rinse tank to facilitate the removal of powder coat paint (non VOC).
- (7) Two (2) paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15. Installed in 2005. [326 IAC 4-2] [326 IAC 9]
- (8) Powder coating operation for coating miscellaneous metal parts, consisting of three (3) spray booths, identified as PB-1, PB-2 and PB-3, with a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by a dust collector exhausting inside the building. This operation is also equipped with one (1) natural gas fired dry off oven identified as ID CU-10 with a maximum heat input rate of 1.0 million Btu per hour and exhausting through stack ID 22; and two (2) powder coating natural gas fired cure ovens identified as ID CU-11 and CU-12 each with a maximum heat input rate of 2.5 million Btu per hour and each exhausting through stacks ID 23 and 24, respectively.
- (9) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by cartridge dust collector and exhausting through stack ID PB-14. This operation is also equipped with one (1) natural gas fired cure oven identified as ID CU-7 with a maximum heat input rate of 0.8 million Btu per hour and exhausting through stack ID 14.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the OES to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit 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.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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 [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and the OES within a reasonable time, any information that IDEM, OAQ, and the OES 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and the OES 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 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, and the OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require

immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report 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, and the OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and the OES may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the OES. IDEM, OAQ, and the OES, 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 PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

City of Indianapolis OES
Telephone No.: 317 327-2234
Facsimile No.: 317 327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ and the OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ and the OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or the OES determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or the OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or the OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or the OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and the OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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, and the OES on or before the date it is due.
 - (2) If IDEM, OAQ and the OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAQ and the OES 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 and the OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- and
- City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and the OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [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, the OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licencing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 is satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Section A.3.

- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 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 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 the "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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

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

- (a) 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 Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "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 the “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 and the OES, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the OES, if the source 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.10 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed 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.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a surface tension, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]
[326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ, and the OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.

The OMM Plan or Parametric Monitoring and SMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 and 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 or the OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES 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.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- and
- City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.
- (d) 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) F-Systems custom built solid lubricant application booth, identified as Emission Unit ID SL-01, for surface coating of miscellaneous metal parts with maximum coating capacity of 4.69 gallons of coating per hour, equipped with dry filters for particulate emissions control and exhausting through Stack ID SV25. There is also one (1) associated natural gas fired curing oven with heat input rate of 2.0 million Btu per hour (both constructed in 1998).

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The Permittee shall comply as follows:

- (a) The total usage of any single hazardous air pollutant (HAP) at F-Systems custom built solid lubricant application booth (SL-01), including HAP usage for clean-up, shall be less than 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.
- (b) The total usage of the combined HAPs at F-Systems custom built solid lubricant application booth (SL-01), including combined HAP usage for clean-up, shall be less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

The actual VOC emissions from the F-Systems custom built solid lubricant application booth (ID SL-01) shall be limited to less than fifteen (15) pounds per day. Therefore, rule 326 IAC 8-2-9 is not applicable to the F-Systems custom built solid lubricant application booth (ID SL-01).

D.1.3 Particulate-Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the F-Systems custom built solid lubricant application booth (SL-01) shall not exceed the pound per hour emission rate established as E in the following formula:

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.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the F-Systems custom built solid lubricant application booth (SL-01), shall be controlled by a dry filter, and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the spray paint facility and its control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.2 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 the 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 the analytical procedures specified in 326 IAC 8-1-4. Compliance with HAP limitations will also limit VOC emissions.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (SV25) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly unless otherwise noted, and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Condition D.1.1 and D.1.2 .
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (i) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (ii) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC and HAP usage for each day;

- (5) The total HAPs usage for each month; and
- (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 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 the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) Single Hoist Line decorative chromium electroplating line, identified as ID SHL-5, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 20, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension. Additionally, tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 5.
- (c) One (1) Dual Hoist Line decorative chromium electroplating line, identified as ID DHL-13, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 58, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension. Additionally, tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 16.

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

Emission Limitations and Standards [326 IAC 2-8-5(1)]

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

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

D.2.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tanks #20 and #58.

D.2.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)] [69 FR 42885] [326 IAC 20-8-1]

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks #20 and #58 by:
- (1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4×10^{-6} gr/dscf)]; or
 - (2) Pursuant to 69 FR 42885, not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] when using a stalagmometer to measure surface tension and thirty-five dynes per centimeter (35 dynes/cm) [equivalent to two and four-tenths times ten raised to the power of negative three

pound-force per foot (2.4×10^{-3} lb_f/ft)] when using a tensiometer to measure surface tension at any time during operation of tanks 20 and 58 when a chemical fume suppressant containing a wetting agent is used.

- (3) Pursuant to 326 IAC 20-8-1, not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] at any time during operation of tanks # 20 and # 58 when a chemical fume suppressant containing a wetting agent is used.

D.2.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tanks #20 and #58:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks #20 and #58, including the chemical wetting agent, the packed bed scrubber whenever being used to demonstrate continuous compliance, and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.2.6.
- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.2.6.
- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, and OES, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ, or OES may require that the Permittee make changes to the OMP required by Condition D.2.6. Revisions may be required if IDEM, OAQ, or OES, finds that the plan:
 - (1) Does not address a malfunction or period of excess emissions that has occurred;
 - (2) Fails to provide for the operation of tanks #20 and #58, the chemical wetting agent, or the packed bed scrubber and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process equipment, chemical wetting agent, monitoring equipment or other causes of excess emissions as quickly as practicable.

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

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan (PMP), in accordance with Section B-Preventive Maintenance Plan, of this permit, is required for tanks #20 and #58 and the chemical wetting agent.

D.2.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

(a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks #20 and #58. The OMP shall specify the operation and maintenance criteria for tanks #20 and #58, the chemical wetting agent, the packed bed scrubber if being used to demonstrate continuous compliance, and monitoring equipment and shall include the following elements:

- (1) For the packed-bed scrubber (PBS):
 - (A) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the packed beds, and no evidence of chemical attack on the structural integrity of the device.
 - (B) Quarterly visual inspection of the back portion of the chevron blade mist eliminator to ensure that it is dry and there is no breakthrough of chromic acid mist.
 - (C) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.
 - (D) Add fresh makeup water to the top of the packed bed if greater than 50% of the scrubber water is drained.

Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension.

- (2) A standardized checklist to document the operation and maintenance criteria for tanks #20 and #58, the air pollution control device, the add-on air pollution control device and the monitoring equipment.
- (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.
- (4) A systematic procedure for identifying malfunctions and periods of excess emissions of tanks #20 and #58, the air pollution control device, the add-on air pollution control device and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.

(The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.2.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.2.6(a).

- (b) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks #20 and #58, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
 - (1) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working

days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ and OES.

- (2) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ, and OES, for the life of tanks #20 and #58 or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ, and OES, for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-8-5(a)(1)&(4)]

D.2.7 Performance Testing [326 IAC 2-1.1-11] [326 IAC 2-8-5(a)(1)&(4)] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

- (a) A performance test demonstrating initial compliance for tanks #20 and # 58 was performed on January 30, 1996.

During the initial performance test conducted on January 30, 1996, it was determined that the total chromium concentration of each stack ID # 5 and 16, using Method 306, Appendix A of 40 CFR 63, was 0.0022 mg/dscm.

- (b) The Permittee is not required to further test tanks #20 and #58 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, or OES, compliance with the limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of tanks #20 and #58, the chemical wetting agent, the packed bed scrubber when used to demonstrate continuous compliance, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)]

D.2.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)] [40 CFR 63.343(c)] [69 FR 42885]

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the electroplating bath to comply with the limit specified in Condition D.2.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tanks #20 and # 58 at a surface tension greater than 45 dynes per centimeter when using a stalagmometer to measure surface tension or greater than 35 dynes per centimeter when using a tensiometer to measure surface tension shall constitute noncompliance with the standards.
 - (1) The surface tension of each chromium electroplating tank in operation shall be monitored once every four (4) hours for the first forty (40) hours of tank operation with a stalagmometer or a tensiometer pursuant to 40 CFR Part 63 Appendix A Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities).
 - (2) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of tank operation, the surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there are no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAQ and OES, until an exceedance occurs.

The source, in accordance with 40 CFR Part 63, Subpart N, agrees to conduct surface tension measurements, at a minimum, once each day of operation provided there are no more than forty (40) hours of tank operation between successive surface tension measurements.

- (3) Once an exceedance occurs through tank surface tension measurement, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in paragraph (2) above.
 - (4) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed as stated in paragraph (2) above.
- (b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

Record Keeping and Reporting Requirements [326 IAC 2-8-5(3)] [326 IAC 2-8-19]

D.2.9 Record Keeping Requirements [326 IAC 2-8-5(3)] [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.2.3, D.2.4 and D.2.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the chemical wetting agent, the packed bed scrubber system whenever being used to demonstrate continuous compliance, and monitoring equipment to document that the inspection and maintenance required by Conditions D.2.7 and D.2.8 have taken place. The record can take the form of a checklist and should identify the following:
 - (1) The device inspected;
 - (2) The date of inspection;
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks #20 and #58, the packed bed scrubber whenever being used to demonstrate continuous compliance and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks #20 and #58, the packed bed scrubber whenever being used to demonstrate continuous compliance and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks #20 and #58, the packed bed scrubber whenever being used to demonstrate continuous compliance and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
- (e) Records of actions taken during periods of malfunction or excess emissions when such

actions are inconsistent with the OMP.

- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (j) The total process operating time, as defined in Condition D.2.8(b), of each tank, during the reporting period.
- (k) Records of the date and time that fume suppressants were added to the electroplating bath, and the amount and type of fume suppressants added.
- (l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.2.10.

D.2.10 Reporting Requirements [326 IAC 2-8-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

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

(a) Notifications:

- (1) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.
 - (A) The NCS shall be submitted to IDEM, OAQ, and OES, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
 - (B) The NCS for tanks #20 and #58 was submitted to IDEM, OAQ and OES.
- (2) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ, and OES. In addition, the Permittee may not change, modify, or reconstruct tanks #20 and #58 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ, and OES.
 - (A) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3).
 - (B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device [i.e., the addition of duct work to the control equipment system].
 - (C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks #20 and #58 serves as this notification.

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

(b) Performance Test Results

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

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

(c) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tanks #20 and #58 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks #20 and #58 are located at site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ, and OES, upon request.

(1) The Ongoing Compliance Status Report shall be completed within thirty (30) days from the date the report period ends and shall be completed according to the following schedule except as provided in paragraph (c)(2).

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

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

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

(A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.2.8(b) for the reporting period; and

(B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.2.8(b).

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

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

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) One (1) polishing station, identified as PU-6B, consisting of twenty six (26) Hand Polisher Work Station Units for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift per work station unit, with each unit weighing approximately 0.524 pounds, and one (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds and using a cartridge dust collector for particulate control identified as Stack ID 6B and exhausting inside the building. This polishing station was installed in 1986.

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the Hand and Robotic Polisher Work Station (PU-6B) shall not exceed 1.44 pounds per hour when operating at a process weight rate of 418.0 pounds per hour.

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

Interpolation of the data for the process weight rate up to 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.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.3.3 Particulate Control

In order to comply with Condition D.3.1, the cartridge dust collector for PM and PM10 control shall be in operation at all times that the Hand and Robotic Polisher Work Station (PU-6B) is in operation.

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

There are no Record Keeping and Reporting Requirements applicable to these emission units.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities

- (a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units (Btu) per hour consisting of:
 - (1) Orr and Sembower natural gas fired boiler, identified as ID CU-1, with a maximum heat input rate of 5.0 million Btu per hour (constructed in 1986).
 - (2) Dunham Bush natural gas fired boiler, identified as ID CU-2, with a maximum heat input rate of 5.0 million Btu per hour (constructed in 1986).
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2].
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).
 - (1) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-6A, using cartridge dust collector for particulate control identified as Stack ID 6A and exhausting inside the building. This unit consists of:
 - (A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds. Four (4) of the polishing units were installed in 1986, one (1) unit, at an exemption level, was installed in 1998, and one (1) unit will be installed in 2004.
 - (B) One (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds. This unit was installed in 2002.
 - (2) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-8. This unit consists of:
 - (A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control identified as Stack ID 8 and exhausting inside the building. Four (4) of the polishing units were installed in 1986 and two (2) remaining units, at an exemption level, were installed in 1998.

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

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities (continued)

- (B) One (1) Robotic Polishing Unit with a maximum capacity of 220 units per eight hour shift with each unit weighing approximately 0.95 pounds, using cartridge dust collector for particulate control identified as Stack ID 8 and exhausting inside the building. This unit was installed in 2002.
- (3) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:
- Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.
- (4) One (1) Robotic Polishing Unit identified as ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 200 units per eight hour shift with each unit weighing approximately 1.749 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 3 and exhaust inside the building.
- (5) One (1) Buffing Unit identified as ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 4 and exhaust inside the building.
- (6) One (1) 500 gallon liquid caustic compound removal tank and one (1) 500 gallon de-ionized water rinse tank to facilitate the removal of powder coat paint (non VOC).
- (7) Two (2) paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15. Installed in 2005. [326 IAC 4-2] [326 IAC 9]
- (8) Powder coating operation for coating miscellaneous metal parts, consisting of three (3) spray booths, identified as PB-1, PB-2 and PB-3, with a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by a dust collector exhausting inside the building. This operation is also equipped with one (1) natural gas fired dry off oven identified as ID CU-10 with a maximum heat input rate of 1.0 million Btu per hour and exhausting through stack ID 22; and two (2) powder coating natural gas fired cure ovens identified as ID CU-11 and CU-12 each with a maximum heat input rate of 2.5 million Btu per hour and each exhausting through stacks ID 23 and 24, respectively.
- (9) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by cartridge dust collector and exhausting through stack ID PB-14. This operation is also equipped with one (1) natural gas fired cure oven identified as ID CU-7 with a maximum heat input rate of 0.8 million Btu per hour and exhausting through stack ID 14.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the

PM emitted from the two (2) natural gas fired boilers, constructed after 1983 (ID CU-1 and CU-2) shall be limited to 0.60 lbs of PM per MMBtu, calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum operation capacity rating = 10.0 MMBtu/hr

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the polishing station identified as PU-8 shall not exceed 0.62 pounds per hour when operating at a process weight rate of 120.5 pounds per hour. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the polishing station identified as PU-6A shall not exceed 0.58 pounds per hour when operating at a process weight rate of 110.0 pounds per hour.

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

Interpolation of the data for the process weight rate up to 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.4.4 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), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing;

abrasive blasting; pneumatic conveying; and woodworking operations.

- (c) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:

Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.
- (d) One (1) Robotic Polishing Unit identified as ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 200 units per eight hour shift with each unit weighing approximately 1.749 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 3 and exhaust inside the building.
- (e) One (1) Buffing Unit identified as ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 4 and exhaust inside the building.
- (f) Powder coating operation for coating miscellaneous metal parts, consisting of three (3) spray booths, identified as PB-1, PB-2 and PB-3, with a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by a dust collector exhausting inside the building. This operation is also equipped with one (1) natural gas fired dry off oven identified as ID CU-10 with a maximum heat input rate of 1.0 million Btu per hour and exhausting through stack ID 22; and two (2) powder coating natural gas fired cure ovens identified as ID CU-11 and CU-12 each with a maximum heat input rate of 2.5 million Btu per hour and each exhausting through stacks ID 23 and 24, respectively.
- (g) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by cartridge dust collector and exhausting through stack ID PB-14. This operation is also equipped with one (1) natural gas fired cure oven identified as ID CU-7 with a maximum heat input rate of 0.8 million Btu per hour and exhausting through stack ID 14.

D.4.5 Incinerators [326 IAC 4-2]

Pursuant to 326 IAC 4-2, Oven CU-13 and Oven CU-14 shall each:

- (a) consist of primary and secondary chambers or the equivalent;
- (b) be equipped with a primary burner;
- (c) comply with 326 IAC 5-1 and 326 IAC 2;
- (d) be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan approved by the Commissioner;
- (e) not emit particulate matter in excess of:
 - (1) five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air;
- (f) if any of the above requirements (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

- (g) The incinerator is exempt from requirement (e) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

D.4.6 Carbon Monoxide Emission Rules [326 IAC 9]

Pursuant to 326 IAC 9, emission of carbon monoxide from Oven CU-13 and Oven CU-14 shall each be limited to the following:

- (a) Refuse incineration and refuse burning equipment: the Permittee shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in one (1) of the following:
- (1) Direct-flame afterburner.
 - (2) Secondary chamber.

Compliance Determination Requirements

D.4.7 Particulate Control

In order to comply with Conditions D.4.3 and D.4.4, the cartridge dust collectors for polishing units PU-1, PU-4, PU-6A, PU-8 and PU-3 for PM and PM10 control shall be in operation at all times that each polishing facility is in operation.

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

There are no Record Keeping and Reporting Requirements applicable to these emission units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: IR Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
FESOP No.: 097-16154-00050

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 BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: IR Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
FESOP No.: 097-16154-00050

This form consists of 2 pages

(Page 1 of 2)

9 This is an emergency as defined in 326 IAC 2-7-1(12)
The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: IR Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
FESOP No.: 097-16154-00050
Facility: F-Systems custom built solid lubricant application booth (SL-01)
Parameter: VOC
Limit: The total input usage of volatile organic compounds (VOC) at spray paint booth SL-01, including VOC usage for clean-up, shall be less than 15 pounds per day.

Month: _____ Year: _____

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

- 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 DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: IR Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
FESOP No.: 097-16154-00050
Facility: F-Systems custom built solid lubricant application booth (SL-01)
Parameter: Single and Combined Hazardous Air Pollutants (HAPs)
Limit: The total input usage of any single HAP, and total HAPs delivered to the applicators in the F-Systems custom built solid lubricant application booth (SL-01) and during clean-up shall be limited to less than 9.0 and 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR:

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 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 DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 DATA COMPLIANCE**

**FESOP CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
 ONGOING COMPLIANCE STATUS REPORT**

Source Name: IR Von Duprin
 Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
 Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
 FESOP No.: 097-16154-00050
 Tank ID #: _____
 Type of process: Decorative
 Monitoring Parameter: Surface tension of the electroplating or anodizing bath
 Parameter Value: 45 dynes per centimeter when using a stalagmometer to measure surface tension; 35 dynes per centimeter when using a tensiometer to measure surface tension.
 Limits: Total chromium concentration may not exceed 0.01 mg/dscm

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

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

This form consists of 2 pages

Page 1 of 2

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:			
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:			
MAJOR AND AREA SOURCES: CHECK ONE			
9 NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.			
9 THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).			
AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC
HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: IR Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
FESOP No.: 097-16154-00050

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement that exists independent of the permit shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document for a Significant Permit Revision to a Federally
Enforceable State Operating Permit

Source Background and Description

Source Name:	IR Von Duprin
Source Location:	2720 Tobey Drive, Indianapolis, IN 46219
County:	Marion
SIC Code:	3442, 3446, 3449, 3471 and 3479
Operation Permit No.:	F097-16154-00050
Operation Permit Issuance Date:	September 22, 2003
Permit Revision No.:	097-20272-00050
Permit Reviewer:	M. Caraher

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed a revision application from IR Von Duprin relating to the operation of surface coating of miscellaneous metal parts, decorative chromium electroplating and metal trimming and stamping of architectural hardware products.

History

On September 22, 2003, Von Duprin was issued FESOP Renewal, 097-16154-00050. On October 14, 2004, IR Von Duprin submitted an application to OES to:

- (a) replace the insignificant activity Kolene Molten Salt Paint Stripping Bath for stripping paint racks, identified as ID CU-9, with two (2) insignificant activity paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15;
- (b) change the frequency of dry filter inspections in Condition D.1.7(a) to verify the placement, integrity and particle loading of the filters from once per shift to once per day; and
- (c) amend the emission standard (Condition D.2.3(b)) and compliance monitoring provision (Condition D.2.8) of 45 dynes per centimeter to 35 dynes per centimeter, per the Federal Register Notice of July 19, 2004 (69 FR 42885), for decorative chromium electroplating sources when using a tensiometer as the means for testing the surface tension of chromium electroplating tanks.

The following sections describe the revisions made to the existing FESOP due to the application request made by the Permittee.

Existing Approvals

This source was issued a FESOP Renewal, 097-16154-00050, on September 22, 2003. The source has since received the following:

- (a) First Administrative Amendment No.: 097-19128-00050, issued on August 6, 2004.

Enforcement Issue

- (a) IDEM and OES are aware that the quarterly compliance monitoring report for the third quarter of 2004 for the Single Hoist Line (SHL-5; Tank # 20) and Dual Hoist Line (DHL-13; Tank # 58) did not show compliance with the following emission limitation:

Pursuant to 69 FR 42885 (the Federal Register Notice of July 19, 2004) and 40 CFR 63.340, Subpart N, the chromium electroplating operations are subject to the following requirements:

- (1) The surface tension of the chromium electroplating bath contained with Tank # 20 and Tank # 58, shall not exceed thirty five dynes (35) per centimeter when using a tensiometer to measure surface tension at any time during the operation of each tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.

IDEM, OAQ issued a violation letter dated November 3, 2004 to IR Von Duprin stating no further action in this matter is needed provided IR Von Duprin maintain the surface tension at 35 dynes per centimeter or less when using a tensiometer for measuring purposes. This First Significant Permit Revision, 097-20272-00050, revises the existing FESOP Permit emission limit and compliance monitoring provisions to reflect the revisions to 40 CFR 63.340, Subpart N as stated in Federal Register Notice of July 19, 2004 (69 FR 42885) and effective July 19, 2004 which are more stringent.

- (b) The source has the following enforcement actions pending (discovered during the OES inspection of October 11, 2004):
 - (1) Failure to comply with Condition D.1.7(a) (Monitoring) by providing no record keeping of second shift inspections to verify the placement, integrity and particle loading of the filters on 198 occasions between December 20, 2003 and October 11, 2004.
 - (2) Failure to comply with Condition D.4.2(c) (Volatile Organic Compounds) by not closing the degreaser cover whenever parts are not being handled in the cleaner.

IDEM, OAQ and OES are reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Administrator that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on October 14, 2004.

Additional information was received on January 18, 2005 to identify descriptive corrections and applicable requirement corrections for the Insignificant Activity polishing units at polishing stations, PU-4, PU-6A, and PU-8. These corrections had been requested by the source to be made for the First Administrative Amendment, F097-19128-00050, issued August 6, 2004 but were inadvertently not incorporated in to the issuance. The corrections to the Insignificant Activity emission units do not increase potential emissions to greater than Insignificant Activity thresholds (see TSD Appendix A pages 3 and 4 of 4) or trigger new applicable requirements. The correction to PU-6A is being made because the process weight rate for PU-6A exceeds one hundred pounds per hour but was not previously identified as such in Condition D.4.3.

Emission Calculations

See Appendix A (pages 1 through 4 of 4) of this document for detailed emissions calculations.

Potential to Emit of the Revision

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

This table reflects the PTE 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	0.1
PM-10	0.1
SO ₂	0.0
VOC	0.5
CO	0.7
NO _x	0.8

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential to Emit (tons/year)
Hexane	1.498E-02
Combined Total	1.571E-02

Justification for Revision

The change in the frequency of dry filter inspections in Condition D.1.7(a) to verify the placement, integrity and particle loading of the filters from once per shift to once per day qualifies as a Minor Permit Revision under 326 IAC 2-8-11.1(d)(1), modifications that reduce the frequency of any monitoring or reporting required by a permit condition or applicable requirement.

The Federal Register Notice of July 19, 2004 (69 FR 42885) revised the Federal emissions standard and compliance monitoring provisions for decorative chromium electroplating operations that utilize a tensiometer to demonstrate compliance with 40 CFR 63.342(d)(2) from 45 dynes per centimeter to 35 dynes per centimeter. Pursuant to 326 IAC 2-8-11.1(d)(6), a change that is not described in 326 IAC 2-8-10(a)(15) or (a)(16) and is subject to a NESHAP and the NESHAP is the most stringent applicable requirement, shall be processed as a Minor Permit Revision.

The replacement of the Kolene Molten Salt Paint Stripping Bath with two (2) insignificant activity paint rack burn off ovens does not increase the potential to emit of any regulated air pollutant greater than the thresholds identified in 326 IAC 2-8-11.1(d) or (f). However, the paint rack burn off ovens do require the addition of two (2) new applicable requirements, 326 IAC 4-2 (Incinerators) and 326 IAC 9 (Carbon Monoxide Emission Rules). Pursuant to 326 IAC 2-8-11.1(g), any modification(s) that trigger any new applicable requirements shall be reviewed in accordance with the significant permit revision procedures in 326 IAC 2-8-11(f)(2).

Therefore, the FESOP is being revised as a Significant Permit Revision. The requested revisions are made pursuant to the procedures stated in 326 IAC 2-8-11.1(f)(2).

Potential to Emit of the Source After the Revision

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls and after the revision. The strikeout and bold face indicates the proposed changes in emission limits.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
F-Systems application booth (ID SL-01)	0.5	0.5	0.0	< 25.0 ⁽¹⁾	0.0	0.0	9.0 (single) 24.0 (total)
Single Hoist Line (ID SHL-5)	Negl.	Negl.	0.0	0.0	0.0	0.0	3.87E-04 (single)
Dual Hoist Line (ID DHL-13)	Negl.	Negl.	0.0	0.0	0.0	0.0	3.87E-04 (single)
Significant Hand Polishing Operation (ID PU-6B)	0.366	0.366	0.0	0.0	0.0	0.0	0.0
Insignificant Robotic Polishing Units (PU-1, PU-3, PU-4, PU-6A and PU-8)	0.33 0.34	0.33 0.34	0.0	0.0	0.0	0.0	0.0
Insignificant Activities ⁽²⁾	0.25 0.35	0.77 0.87	0.1	1.34 1.81	7.55 8.25	9.02 9.82	0.35 (single) 0.50 0.516 (total)
Total PTE After Issuance	1.45 1.56	1.97 2.08	0.1	26.34 26.81	7.55 8.25	9.02 9.82	< 10 (single) < 25 (total)

Notes: (1) Reflects limited potential emissions from paint spray booth to make the requirements of 326 IAC 8-1-6 not applicable. (2) Insignificant Activities consist of natural gas combustion units (Microturbine, CU-1, CU-2, CU-7, ~~CU-9~~, CU-10, CU-11, ~~and CU-12~~, **CU-13 and CU-14**) and powder coating booths (PB-1, PB-02, PB-03, and PB-14). **PTE of a single HAP, Hexane, from CU-13 and CU-14 is less than the PTE of any single HAP from all other Insignificant Activities.**

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Unclassifiable
SO ₂	Maintenance attainment
NO _x	Attainment
1-hour Ozone	Maintenance attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment of the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, PM-10, SO₂, CO and Lead emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing source PSD definition (emissions after controls, based on 8760 hours of operation at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	1.56
PM-10	2.08
SO ₂	0.10
VOC	26.81
CO	8.25
NO _x	9.82

- (a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD and Emission Offset requirements do not apply.
- (b) These emissions are based upon the Technical Support Document (TSD) for FESOP Renewal 097-16154-00050, issued on September 22, 2003, on the First Administrative Amendment 097-19128-00050, issued on August 6, 2004, and this review for the First Significant Permit Revision 097-20272-00050 including the additional information submitted by the source on January 18, 2005 in regard to Insignificant Activity polishing units.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the First Significant Permit Revision, 097-20272-00050 for this source.
- (b) Single Hoist Line (SHL-5; Tank # 20) and Dual Hoist Line (DHL-13; Tank # 58) are each subject to the National Emission Standards for Hazardous Air Pollutants (40 CFR 63.340, Subpart N and 326 IAC 20-8-1).

On July 19, 2004, U.S. EPA revised in 69 FR 42885 the existing emission standard and compliance monitoring provisions of 40 CFR 63.340, Subpart N for decorative chromium electroplating tanks that use fume suppressants to demonstrate compliance with 40 CFR 63.342(d). Specifically, decorative chromium electroplating tanks utilizing fume suppressants and measuring the surface tension of the tank bath with a tensiometer, shall now not exceed 35 dynes per centimeter, a more stringent surface tension limit than the existing FESOP requirement of 45 dynes per centimeter when using a tensiometer. The effective date of the revision is July 19, 2004. This source measures the surface tension of Tank # 20 and Tank # 58 with a ring tensiometer and requested on October 14, 2004 to revise the Section D.2 decorative chromium electroplating provisions of the existing FESOP, 097-16154-00050, and First Administrative Amendment, 097-19128-00050 from 45 dynes per centimeter to 35 dynes per centimeter.

Pursuant to "Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations - Background Information for Proposed Standards," EPA 453/R-93-030a Volume 1, the lower the surface tension of a plating bath, the lower the emissions. Therefore, a surface tension limit of 35 dynes per centimeter is more stringent than the previously existing NESHAP limit of 45 dynes per centimeter.

Therefore, pursuant to 69 FR 42885 (the Federal Register Notice of July 19, 2004) and 40 CFR 63.340, Subpart N, the chromium electroplating operations are subject to the following requirements:

- (1) The surface tension of the chromium electroplating bath contained with Tank # 20 and Tank # 58, shall not exceed forty-five (45) dynes per centimeter when using a stalagmometer to measure surface tension and thirty-five dynes (35) per centimeter when using a tensiometer to measure surface tension at any time during the operation of each tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
- (2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter when using a stalagmometer to measure surface tension and thirty five (35) dynes per centimeter when using a tensiometer to measure surface tension, the frequency must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.
- (3) An alternative emission limit of 0.01 milligram per dry standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.
- (4) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM and OES upon request. If there are significant exceedances of chromium air emission limits (as defined in 40 CFR 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
Chromium Electroplating
100 North Senate Avenue

Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

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

Each chromium electroplating operation tank, Tank # 20 and Tank # 58, are controlled by a chemical wetting agent with surface tension of the tank bath not exceeding forty-five (45) dynes per centimeter when using a stalagmometer to measure surface tension and thirty-five (35) dynes per centimeter when using a tensiometer to measure surface tension at any time during operation of the tank. Additionally, each tank is controlled by a packed bed scrubber. However, the scrubber does not need to be operated at all times but may be operated at the Permittee's discretion as permitted in the initial FESOP, 097-6983-00050, issued on June 23, 1998, and in the FESOP Renewal, 097-16154-00050, issued September 22, 2003.

Pursuant to 40 CFR 63.343, Subpart N and 69 FR 42885 (the July 19, 2004 Federal Register Notice), the permittee is exempt from conducting a performance test because each of the criteria of 40 CFR 63.343(b)(2) are met. The criteria of 40 CFR 63.343(b)(2) are:

- (1) the affected source is a decorative chromium electroplating tank;
 - (2) a wetting agent is used in the plating bath to inhibit chromium emissions from the affected source; and
 - (3) the owner or operator complies with the applicable surface tension limit of 40 CFR 63.342(d)(2) as demonstrated through the continuous compliance monitoring required by 40 CFR 63.343(c)(5)(ii).
- (c) This source is not subject to 40 CFR 61 (National Emission Standards for Hazardous Air Pollutants) or 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) because neither the source nor any specific emission unit performs any activity specifically regulated by 40 CFR 61 or 326 IAC 14. There are no applicable provisions pursuant to 40 CFR 61 or 326 IAC 14. Therefore, 40 CFR 61 (National Emission Standards for Hazardous Air Pollutants) and 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) do not apply to this First Significant Permit Revision or to this source.
- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this revision or to this source. Such requirements apply to a pollutant specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant;

- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
- (3) the unit has a potential to emit (PTE) before controls equal or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this revision or to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This existing source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. This Significant Permit Revision, which adds the Insignificant Activity paint rack burn off ovens, Oven CU-13 and Oven CU-14, does not increase the potential to emit of this source such that the source is a major source, pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 or 326 IAC 2-3 are each not applicable to the source.

326 IAC 2-4.1 (New Source Toxics Control)

The source has opted to continue to operate pursuant to 326 IAC 2-8 (FESOP) which limits the source-wide HAP emissions to less than ten (10) tons per year of any single HAP and to less than twenty five (25) tons per year of any combination of HAP. This Significant Permit Revision, which adds the Insignificant Activity paint rack burn off ovens, Oven CU-13 and Oven CU-14, does not increase the potential to emit of this source such that the source is a major source, pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-4.1 is not applicable.

326 IAC 2-8-4 (Federally Enforceable State Operating Permit Program (FESOP))

This source is subject to 326 IAC 2-8-4. Pursuant to this rule and FESOP Renewal F097-16154-00050 issued September 22, 2003, the source shall comply as follows:

- (a) The total usage of any single hazardous air pollutant (HAP) at F-Systems custom built solid lubricant application booth (SL-01), including HAP usage for clean up, shall be less than nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source wide potential to emit any single HAP to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The total usage of the combined HAPs at F-Systems custom built solid lubricant application booth (SL-01), including combined HAP usage for clean up, shall be less than twenty four (24) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source wide potential to emit combined total HAPs to less than twenty five (25) tons per twelve (12) consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

326 IAC 5 (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 the 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.

326 IAC 6-1-2 (Particulate Rules)

This source is not subject to the requirements of 326 IAC 6-1-2 because the potential particulate emissions are less than one hundred (100) tons per year and actual particulate emissions are less than ten (10) tons per year.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than twenty five (25) tons per year.

State Rule Applicability – Individual Facilities

Addition of paint rack burn off ovens, CU-13 and CU-14

326 IAC 4-2 (Incinerators)

326 IAC 1-2-34 defines an incinerator as an “engineered apparatus that burns waste substances with controls on combustion factors, including but not limited to, temperature, retention time, and air”. The paint racks are introduced in to CU-13 and CU-14 to burn waste substances from their surfaces. Therefore, CU-13 and CU-14 are each defined as an incinerator. As a result, 326 IAC 4-2 does apply to the paint rack burn off ovens CU-13 and CU-14.

Pursuant to 326 IAC 4-2-2, all incinerators shall:

- (a) consist of primary and secondary chambers or the equivalent;
- (b) be equipped with a primary burner;
- (c) comply with 326 IAC 5-1 and 326 IAC 2;
- (d) be maintained, operated, and burn waste in accordance with the manufacturer’s specifications or an operation and maintenance plan approved by the Commissioner;
- (e) not emit particulate matter in excess of:
 - (1) five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air;

- (f) if any of the above requirements (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (g) The incinerator is exempt from requirement (e) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

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

Pursuant to 326 IAC 6-3-1(b), incinerators are exempt from the requirements of 326 IAC 6-3. Because CU-13 and CU-14 are each an incinerator and subject to the particulate matter emission limitation pursuant to 326 IAC 4-2 (Incinerators), 326 IAC 6-3 does not apply to CU-13 and CU-14.

326 IAC 9 (Carbon Monoxide Emission Rules)

Pursuant to 326 IAC 9, emissions of carbon monoxide shall be limited as follows:

- (a) Refuse incineration and refuse burning equipment: the Permittee shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in one (1) of the following:
 - (1) Direct-flame afterburner.
 - (2) Secondary chamber.

Revision to bath surface tension limits for the Single Hoist Line (SHL-5; Tank # 20) and Dual Hoist Line (DHL-13; Tank # 58)

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)

See the Federal Rule Applicability section of this Technical Support Document.

326 IAC 20-8-1 (Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks)

326 IAC 20-8-1 has not been revised to reflect the July 19, 2004, U.S. EPA revisions to the existing emission standard and compliance monitoring provisions of 40 CFR 63.340, Subpart N for decorative chromium electroplating tanks that use fume suppressants to demonstrate compliance with 40 CFR 63.342(d) as stated in 69 FR 42885. Pursuant to 326 IAC 20-8-1, the chromium electroplating operations are subject to the following requirements:

- (1) The surface tension of the chromium electroplating bath contained with Tank # 20 and Tank # 58, shall not exceed forty five dynes (45) per centimeter at any time during the operation of each tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
- (2) Each time that surface tension monitoring exceeds forty five (45) dynes per centimeter, the frequency must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.
- (3) An alternative emission limit of 0.01 milligram per dry standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.

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

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
Chromium Electroplating
100 North Senate Avenue
Indianapolis, Indiana 46204

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

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

Each chromium electroplating operation tank, Tank # 20 and Tank # 58, are controlled by a chemical wetting agent with surface tension of the tank bath not exceeding 45 dynes per centimeter at any time during operation of the tank. Additionally, each tank is controlled by a packed bed scrubber. However, the scrubber does not need to be operated at all times but may be operated at the Permittee's discretion as permitted in the initial FESOP, 097-6983-00050, issued on June 23, 1998, and in the FESOP Renewal, 097-16154-00050, issued September 22, 2003. Because a surface tension limit of 35 dynes per centimeter is more stringent than a surface tension limit of 45 dynes per centimeter, compliance with the July 19, 2004, U.S. EPA revisions to the existing emission standard and compliance monitoring provisions of 40 CFR 63.340, Subpart N, as stated in 69 FR 42885, demonstrates compliance with the provisions of 326 IAC 20-8-1.

Corrections to Insignificant Activity Polishing Units PU-4, PU-6A and PU-8

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

The First Administrative Amendment, 097-19128-00050, issued August 6, 2004 allowed the replacement of one polishing unit in polishing station PU-6A. The potential emission rate of particulate matter for polishing station PU-6A is less than five (5) pounds per hour and remains an Insignificant Activity (see TSD Appendix A page 4 of 4). However, the replacement unit increased the maximum process rate from 94.3 pounds per hour to 110.0 pounds per hour (see TSD Appendix A page 4 of 4). As a result of the increase in the maximum process rate for polishing station PU-6A to greater than one hundred (100) pounds per hour, the First Administrative Amendment should have established a particulate emission limit for polishing station PU-6A pursuant to the equation identified in 326 IAC 6-3-2(e) for a process weight rate up to sixty thousand pounds per hour.

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the polishing station identified as PU-6A shall not exceed 0.58 pounds per hour when operating at a process weight rate of 110.0 pounds per hour.

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 cartridge dust collector for particulate control identified as 6A shall be in operation at all times PU-6A is in operation, in order to comply with this limit.

The information submitted by the source on January 18, 2005 for polishing station PU-8 adjusted the maximum process rate from 110.0 pounds per hour to 120.5 pounds per hour (see TSD Appendix A page 4 of 4) for polishing station PU-8. The potential emission rate of particulate matter for polishing station PU-8 is less than five (5) pounds per hour and remains an Insignificant Activity (see TSD Appendix A page 4 of 4). As a result of the increase in the maximum process rate for polishing station PU-8, the particulate emission limit pursuant to the equation identified in 326 IAC 6-3-2(e) for a process weight rate up to sixty thousand pounds per hour and stated in the existing Condition D.4.3 must be revised.

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the polishing station identified as PU-8 shall not exceed **0.62** ~~0.58~~ pounds per hour when operating at a process weight rate of **120.5** ~~110.04~~ pounds per hour.

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 cartridge dust collector for particulate control identified as 8 shall be in operation at all times PU-8 is in operation, in order to comply with this limit.

The information submitted by the source on January 18, 2005 for polishing station PU-4 revised descriptive information for this Insignificant Activity unit and decreased the maximum process rate for this unit from 26.1 pounds per hour to 15.7 pounds per hour (see TSD Appendix A page 3 of 4). The potential emission rate of particulate matter for polishing station PU-4 is less than five (5) pounds per hour and remains an Insignificant Activity (see TSD Appendix A page 3 of 4). Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour as stated in Condition D.4.4 of the existing FESOP, 097-16154-00050 and Condition D.4.4 of this First Significant Permit Revision, 097-20272-00050.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ and OES in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet

Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Permittee shall continue to comply with the compliance determination and compliance monitoring requirements as stated in the FESOP Renewal, 097-16154-00050 issued September 22, 2003 and the First Administrative Amendment, 097-19128-00050 issued August 8, 2004 except as stated in 69 FR 42885 (the July 19, 2004 Federal Register) that the surface tension of Tank # 20 and Tank # 58 shall each not exceed 35 dynes per centimeter when using a tensiometer to measure surface tension as described in the *Proposed Changes* section of this Technical Support Document.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Change 1

The replacement of the Kolene Molten Salt Paint Stripping Bath for stripping paint racks with two paint burn off ovens causes the Insignificant Activity list in Condition A.3 (Insignificant Activities) to be revised as follows:

- (r) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).

- (7) ~~Kolene Molten Salt Paint Stripping Bath for stripping paint racks, identified as ID CU-9. This unit is also equipped with natural gas fired burner system with maximum heat input rate of 1.8 million Btu per hour.~~

Two (2) paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15. Installed in 2005. [326 IAC 4-2] [326 IAC 9]

Change 2

The replacement of the Kolene Molten Salt Paint Stripping Bath for stripping paint racks with two paint burn off ovens causes the description box of Insignificant Activities listed in Section D.4 (Insignificant Activities) to be revised as follows:

- (e) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).

- (7) ~~Kolene Molten Salt Paint Stripping Bath for stripping paint racks, identified as ID CU-9. This unit is also equipped with natural gas fired burner system with maximum heat input rate of 1.8 million Btu per hour.~~

Two (2) paint rack burn off ovens for stripping paint racks. Oven one is identified as CU-13 and oven two is identified as CU-14. The process weight rate of coatings to be stripped off racks in each burn off oven, CU-13 and CU-14, is less than one hundred (100) pounds per hour. Each paint rack burn off oven is natural gas fired with a maximum heat input capacity of 0.95 million Btu per hour for combined total heat input capacity of 1.9 million Btu per hour. Oven CU-13 and Oven CU-14 exhaust to Stack/Vent SV-15. Installed in 2005. [326 IAC 4-2] [326 IAC 9]

Change 3

The two (2) paint rack burn off ovens are defined as incinerators and are, therefore, each subject to 326 IAC 4-2 (Incinerators) and 326 IAC 9 (Carbon Monoxide Emission Rules). Therefore, two (2) new applicable requirements are now added as Condition D.4.5 and D.4.6 with the subsequent renumbering of existing Condition D.4.5 Particulate Control to reflect the additions as follows:

D.4.5 Incinerators [326 IAC 4-2]

Pursuant to 326 IAC 4-2, Oven CU-13 and Oven CU-14 shall each:

- (a) consist of primary and secondary chambers or the equivalent;**
- (b) be equipped with a primary burner;**
- (c) comply with 326 IAC 5-1 and 326 IAC 2;**
- (d) be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan approved by the Commissioner;**
- (e) not emit particulate matter in excess of:
 - (1) five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air;****
- (f) if any of the above requirements (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.**
- (g) The incinerator is exempt from requirement (e) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.**

D.4.6 Carbon Monoxide Emission Rules [326 IAC 9]

Pursuant to 326 IAC 9, emission of carbon monoxide from Oven CU-13 and Oven CU-14 shall each be limited to the following:

- (a) Refuse incineration and refuse burning equipment: the Permittee shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in one (1) of the following:
 - (1) Direct-flame afterburner.**
 - (2) Secondary chamber.****

D.4.57 Particulate Control

In order to comply with Conditions D.4.3 and D.4.4, the cartridge dust collectors for polishing units PU-1, PU-4, PU-6A, PU-8 and PU-3 for PM and PM10 control shall be in operation at all times that ~~the~~ each polishing facility is in operation.

Change 4

The change in the frequency of dry filter inspections in Condition D.1.7(a) to verify the placement, integrity and particle loading of the filters from once per shift to once per day also requires a change in the record keeping Condition D.1.8(b). These two changes are as follows:

D.1.7 Monitoring

- (a) ~~Once per shift~~ **Daily** inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (SV25) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.8 Record Keeping Requirements

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, ~~daily once per shift~~ and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Change 5

Per 69 FR 42885 (the Federal Register Notice of July 19, 2004), for decorative chromium electroplating sources using a tensiometer as the means for testing the surface tension of chromium electroplating tanks, Condition D.2.3(b) and Condition D.2.8 are revised from 45 dynes per centimeter to 35 dynes per centimeter when using a tensiometer to measure surface tension. A new Condition D.2.3(b)(3) was added to reflect the current State requirement pursuant to 326 IAC 20-8-1. These revisions are made as follows:

D.2.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)] **[69 FR 42885]** **[326 IAC 20-8-1]**

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks #20 and #58 by:
- (1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4×10^{-6} gr/dscf)]; or

- (2) **Pursuant to 69 FR 42885, not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] when using a stalagmometer to measure surface tension and thirty-five dynes per centimeter (35 dynes/cm) [equivalent to two and four-tenths times ten raised to the power of negative three pound-force per foot (2.4×10^{-3} lb_f/ft)] when using a tensiometer to measure surface tension at any time during operation of tanks 20 and 58 when a chemical fume suppressant containing a wetting agent is used.**
- (3) **Pursuant to 326 IAC 20-8-1, not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] at any time during operation of tanks #20 and #58 when a chemical fume suppressant containing a wetting agent is used.**

D.2.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)] [40 CFR 63.343(c)] **[69 FR 42885]**

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the electroplating bath to comply with the limit specified in Condition D.2.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tanks #20 and #58 at a surface tension greater than 45 dynes per centimeter **when using a stalagmometer to measure surface tension or greater than 35 dynes per centimeter when using a tensiometer to measure surface tension** shall constitute noncompliance with the standards.

Change 6

The reference to 45 dynes per centimeter was also stated in the equipment description in Condition A.2 and in the description box in Section D.2. Per 69 FR 42885 (the Federal Register Notice of July 19, 2004), for decorative chromium electroplating sources using a tensiometer as the means for testing the surface tension of chromium electroplating tanks, Condition A.2(b) and (c) and the description box in Section D.2 are revised from 45 dynes per centimeter to 35 dynes per centimeter when using a tensiometer to measure surface tension as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (b) One (1) Single Hoist Line decorative chromium electroplating line, identified as ID SHL-5, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 20, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, **at any time during operation of the tank**, 45 dynes per centimeter **when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension** ~~at any time during operation of the tank~~. Additionally, tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 5.
- (c) One (1) Dual Hoist Line decorative chromium electroplating line, identified as ID DHL-13, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 58, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, **at any time during operation of the tank**, 45 dynes per centimeter **when using a stalagmometer to measure surface tension and 35 dynes per**

centimeter when using a tensiometer to measure surface tension ~~at any time during operation of the tank.~~ Additionally, tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 16.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) Single Hoist Line decorative chromium electroplating line, identified as ID SHL-5, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 20, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding, **at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension** ~~at any time during operation of the tank.~~ Additionally, tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 5.
- (c) One (1) Dual Hoist Line decorative chromium electroplating line, identified as ID DHL-13, constructed in 1986, and consisting of one (1) chromium electroplating tank, identified as Tank # 58, controlled by a chemical wetting agent with surface tension of the tank bath not exceeding **at any time during operation of the tank, 45 dynes per centimeter when using a stalagmometer to measure surface tension and 35 dynes per centimeter when using a tensiometer to measure surface tension** ~~at any time during operation of the tank.~~ Additionally, tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting through stack ID 16.

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

Change 7

The reference to 45 dynes per centimeter was also stated in the Ongoing Compliance Status Report form that appeared on page 46 of 49 of the First Administrative Amendment 097-19128-00050, issued on August 6, 2004. Per 69 FR 42885 (the Federal Register Notice of July 19, 2004), for decorative chromium electroplating sources using a tensiometer as the means for testing the surface tension of chromium electroplating tanks, the Ongoing Compliance Status Report form is revised from 45 dynes per centimeter to 35 dynes per centimeter as follows:

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

FESOP CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
ONGOING COMPLIANCE STATUS REPORT

Source Name: IR Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, IN 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, IN 46219
FESOP No.: 097-16154-00050
Tank ID #: _____
Type of process: Decorative

Monitoring Parameter: Surface tension of the electroplating or anodizing bath
Parameter Value: 45 dynes per centimeter **when using a stalagmometer to measure surface tension; 35 dynes per centimeter when using a tensiometer to measure surface tension.**
Limits: Total chromium concentration may not exceed 0.01 mg/dscm

Change 8

The Permittee has made an application to replace emission units at the source, specifically, two insignificant activity paint rack burn off ovens are to be installed and replace the existing Kolene Molten Salt Paint Stripping Bath. The Permittee is seeking approval to modify the existing FESOP, F097-16154-00050, pursuant to 326 IAC 2-8-11.1. Therefore, Condition B.23 (Advanced Source Modification Approval is added as follows:

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) **The requirements to obtain a permit revision under 326 IAC 2-8-11.1 is satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Section A.3.**
- (b) **Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.**

Change 9

The addition of Condition B.23 (Advanced Source Modification Approval) requires that the 3rd paragraph of the Title page be amended as follows:

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. **This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.**

Change 10

The additional information received from the source on January 18, 2005 identified descriptive corrections to Insignificant Activity individual polishing units at polishing stations, PU-4, PU-6A and PU-8. These corrections had been requested by the source to be made for the First Administrative Amendment, F097-19128-00050, issued August 6, 2004 but were inadvertently not incorporated in to the issuance. The corrections to these Insignificant Activity emission units do not increase emissions to greater than any Insignificant Activity emission threshold. In addition, the First Administrative Amendment, F097-19128-00050, issued August 6, 2004, established an additional and conflicting allowable particulate emission rate pursuant to 326 IAC 6-3-2 for polishing station PU-8 as Condition D.4.4(g). Therefore, revisions to the Insignificant Activity descriptions for these units in Condition A.3(r)(2)(A) & (B), Condition A.3(r)(5), to the description box in Section D.4, Condition D.4.3 and reference to these units in Condition D.4.4 are as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

- (r) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).

- (2) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-8. This unit consists of:
 - (A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control identified as Stack ID ~~4~~ **8** and exhausting inside the building. Four (4) of the polishing units were installed in 1986 and two (2) remaining units, at an exemption level, were installed in 1998.
 - (B) One (1) ~~Robotic Polishing~~ **Buffing Robotic Polishing** Unit with a maximum capacity of ~~240~~ **220** units per eight hour shift with each unit weighing approximately ~~0.524~~ **0.95** pounds, using cartridge dust collector for particulate control identified as Stack ID ~~4~~ **8** and exhausting inside the building. This unit was installed in ~~1986~~ **2002**.
- (5) One (1) ~~Robotic Polishing~~ **Buffing** Unit identified as ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of ~~220~~ **240** units per eight hour shift with each unit weighing approximately ~~0.95~~ **0.524** pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID ~~8~~ **4** and exhaust inside the building.

D.4.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the polishing station identified as PU-8 shall not exceed ~~0.62~~ **0.58** pounds per hour when operating at a process weight rate of ~~120.5~~ **110.04** pounds per hour. **Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the polishing station identified as PU-6A shall not exceed 0.58 pounds per hour when operating at a process weight rate of 110.0 pounds per hour.**

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

Interpolation of the data for the process weight rate up to 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.4.4 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), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000

actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

~~(c) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-6A, using cartridge dust collector for particulate control identified as Stack ID 6A and exhausting inside the building. This unit consists of:~~

~~(A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds. Four (4) of the polishing units were installed in 1986, one (1) unit, at an exemption level, was installed in 1998, and one (1) unit will be installed in 2004.~~

~~(B) One (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds. This unit was installed in 2002.~~

~~(c)~~ (c) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:

(A) One (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds.

(B) Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.

~~(d)~~ (d) One (1) Robotic Polishing Unit identified as ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 200 units per eight hour shift with each unit weighing approximately 1.749 pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID 3 and exhaust inside the building.

~~(e)~~ (e) One (1) Robotic Polishing **Buffing** Unit identified as ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of ~~220~~ **240** units per eight hour shift with each unit weighing approximately ~~0.95~~ **0.524** pounds. Particulate emissions from this unit are controlled by a cartridge dust collector identified as stack ID ~~3~~ **4** and exhaust inside the building.

~~(g) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-8. This unit consists of:~~

~~(A) Six (6) Robotic Polishing units with a maximum capacity of each Polishing Unit of 240 units per eight hour shift per polishing unit, with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control identified as Stack ID 1 and exhausting inside the building. Four (4) of the polishing units were installed in 1986 and two (2) remaining units, at an exemption level, were installed in 1998.~~

~~(B) One (1) Buffing Unit with a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.524 pounds, using cartridge dust collector for particulate control identified as Stack ID 4 and exhausting inside the building. This unit was installed in 1986.~~

- (h) (f) Powder coating operation for coating miscellaneous metal parts, consisting of three (3) spray booths, identified as PB-1, PB-2 and PB-3, with a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by a dust collector exhausting inside the building. This operation is also equipped with one (1) natural gas fired dry off oven identified as ID CU-10 with a maximum heat input rate of 1.0 million Btu per hour and exhausting through stack ID 22; and two (2) powder coating natural gas fired cure ovens identified as ID CU-11 and CU-12 each with a maximum heat input rate of 2.5 million Btu per hour and each exhausting through stacks ID 23 and 24, respectively.
- (i) (g) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Particulate emissions from this operation are controlled by cartridge dust collector and exhausting through stack ID PB-14. This operation is also equipped with one (1) natural gas fired cure oven identified as ID CU-7 with a maximum heat input rate of 0.8 million Btu per hour and exhausting through stack ID 14.

Change 11

All references to the mailing address of IDEM, OAQ throughout the FESOP has been revised to the new mail address as follows:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **46204**

Conclusion

The operation of this revision to the existing surface coating of miscellaneous metal parts operation, decorative chromium electroplating and metal trimming and stamping of architectural hardware products operation shall be subject to the conditions of the attached First Significant Permit Revision, 097-20272-00050.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Addendum to the Technical Support Document for a Significant Permit
Revision to a Federally Enforceable State Operating Permit**

Source Name:	IR Von Duprin
Source Location:	2720 Tobey Drive, Indianapolis, IN 46219
County:	Marion
SIC Code:	3442, 3446, 3449, 3471 and 3479
Operation Permit No.:	F097-16154-00050
Operation Permit Issuance Date:	September 22, 2003
Permit Revision No.:	097-20272-00050
Permit Reviewer:	M. Caraher

On March 4, 2005, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that IR Von Duprin had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to: 1) replace the Kolene Molten Salt Paint Stripping Bath for stripping paint racks with two (2) insignificant activity burn off ovens; 2) change the frequency of dry filter inspections in Condition D.1.7(a) from once per shift to once per day; 3) amend the emission standard and compliance monitoring provisions for decorative chromium electroplating sources, per the Federal Register Notice of July 19, 2004 (69 FR 42885), when using a tensiometer as the means for testing the surface tension of chromium electroplating tanks; 4) amend two Insignificant Activity equipment descriptions, PU-4 and PU-8; and 5) amend Condition D.4.3 to include the allowable particulate emission limit, pursuant to 326 IAC 6-3-2. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 28, 2005, IR Von Duprin submitted comments on the draft Significant Permit Revision. OAQ and OES noted additional revisions that must be made prior to the issuance of this permit. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with strikethrough has been deleted. The Table of Contents has been modified to reflect these changes.

The comments and responses, including changes to the permit, are as follows:

Comment 1:

Condition C.14 (Risk Management Plan) contains an incomplete reference to a citation. The missing reference follows the words "defined in" and precedes the words "is present."

Response to Comment 1:

The missing citation is added to Condition C.14 (Risk Management Plan) as follows:

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in **40 CFR 68**, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

Comment 2:

Condition D.1.4 (Particulate) also contains an incomplete reference to a citation. The missing reference follows the words "Pursuant to" and precedes the words "326 IAC."

Response to Comment 2:

The word "and" in Condition D.1.4 (Particulate) is a typographical error and is deleted as follows:

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to ~~and~~ 326 IAC 6-3-2(d), particulate from the F-Systems custom built solid lubricant application booth (SL-01), shall be controlled by a dry filter, and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

Comment 3:

IR Von Duprin wishes to delete two (2) hand polisher workstations or units (one hand lathe) from Emission Unit ID PU-6B for polishing miscellaneous metal parts. This unit will be replaced with one (1) Robotic Polishing Unit currently identified in PU-1 for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing, approximately, 0.309 pounds. The two (2) Hand Polisher Work Station Units in PU-1 will continue to be referenced as PU-1 and the robotic polishing unit will be absorbed into the PU-6B emission unit.

Response to Comment 3:

The requested changes effect the emission unit descriptions in Condition A.2(d), A.3(r)(3), and in the description boxes in Section D.3 and Section D.4. These Conditions are revised as shown below.

The deletion of two (2) hand polisher workstations from PU-6B along with moving the existing one (1) Robotic Polishing Unit from PU-1 to PU-6B does change the process weight rate and particulate emission rate for PU-6B, established pursuant to 326 IAC 6-3-2 and in Condition D.3.1 (Particulate) (see Appendix A to this Addendum to the Technical Support Document pages 1 and 2 of 2). As a result, the process weight rate in Condition D.3.1 for PU-6B is now changed from 440.16 pounds per hour to 418.0 pounds per hour. Pursuant to 326 IAC 6-3-2, the particulate emission rate in Condition D.3.1 is changed from 1.49 pounds per hour to 1.44 pounds per hour based on the allowable particulate emission rate calculation from 326 IAC 6-3-2 for a process weight rate of 418.0 pounds per hour $(4.10 \times (418/2000))^{0.67} = 1.44$ pounds PM per hour). The change in the type of polishing units that PU-6B consists of also causes a change in Condition D.3.3 (Particulate Control). In addition, the Potential to emit of PU-6B after the revision must now be revised because of this change to the limited potential to emit for PU-6B as stated in FESOP Renewal 097-16154-00050, issued September 22, 2003. Based on the comments received from IR Von Duprin, a revised potential to emit of the source after the revision table is also shown below.

The removal of the one (1) Robotic Polishing Unit from PU-1 does not effect the particulate emission rate, established pursuant to 326 IAC 6-3-2, and stated in Condition D.4.4, because the process weight rate for PU-1 was already less than one hundred (100) pounds per hour before the removal of the Unit from PU-1. However, the one (1) Robotic Polishing Unit previously operating as PU-1 was specifically identified in Condition D.4.4(c)(A) and is now deleted from Condition D.4.4(c).

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (d) One (1) polishing station, identified as PU-6B, consisting of **twenty six (26)** ~~twenty eight (28)~~ Hand Polisher Work Station Units for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift per work station unit, with each unit weighing approximately 0.524 pounds, **and one (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds**, and using a cartridge dust collector for particulate control identified as Stack ID 6B and exhausting inside the building. This polishing station was installed in 1986.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (r) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and NO_x, less than 25 pounds per day CO, or less than 3 pounds per hour VOC).
 - (3) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:
 - (A) ~~One (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds.~~
 - (B) ~~Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.~~

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) One (1) polishing station, identified as PU-6B, consisting of **twenty six (26)** ~~twenty eight (28)~~ Hand Polisher Work Station Units for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift per work station unit, with each unit weighing approximately 0.524 pounds, **and one (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds** and using cartridge dust collector for particulate control identified as Stack ID 6B and exhausting inside the building. This polishing station was installed in 1986.

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the Hand **and Robotic** Polisher Work Station (PU-6B) shall not exceed **1.44** ~~4.49~~ pounds per hour when operating at a process weight rate of **418.0** ~~440.16~~ pounds per hour.

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

Interpolation of the data for the process weight rate up to 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.3.3 Particulate Control

In order to comply with Condition D.3.1, the cartridge dust collector for PM and PM10 control shall be in operation at all times that the Hand **and Robotic** Polisher Work Station (PU-6B) is in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities (continued)

- (B) One (1) Robotic Polishing Unit with a maximum capacity of 220 units per eight hour shift with each unit weighing approximately 0.95 pounds, using cartridge dust collector for particulate control identified as Stack ID 8 and exhausting inside the building. This unit was installed in 2002.

- (3) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:
 - ~~(A) One (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds.~~

 - ~~(B) Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.~~

D.4.4 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), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

- (c) One (1) polishing station for polishing miscellaneous metal parts, identified as PU-1, using cartridge dust collector for particulate control, identified as Stack ID 1A and exhausting inside the building. This unit consists of:
 - ~~(A) One (1) Robotic Polishing Unit for polishing miscellaneous metal parts at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds.~~

 - ~~(B) Two (2) Hand Polisher Work Station Units with one (1) hand lathe for the correction of robotic polishing defects at a maximum capacity of 240 units per eight hour shift with each unit weighing approximately 0.309 pounds. These units will be installed in 2004.~~

Potential to Emit of the Source After the Revision

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls and after the revision. The ~~strikeout~~ and bold face indicates the proposed changes in emission limits.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
F-Systems application booth (ID SL-01)	0.5	0.5	0.0	< 25.0 ⁽¹⁾	0.0	0.0	9.0 (single) 24.0 (total)
Single Hoist Line (ID SHL-5)	Negl.	Negl.	0.0	0.0	0.0	0.0	3.87E-04 (single)
Dual Hoist Line (ID DHL-13)	Negl.	Negl.	0.0	0.0	0.0	0.0	3.87E-04 (single)
Significant Hand Polishing Operation (ID PU-6B)	0.366 0.38	0.366 0.38	0.0	0.0	0.0	0.0	0.0
Insignificant Robotic Polishing Units (PU-1, PU-3, PU-4, PU-6A and PU-8)	0.34	0.34	0.0	0.0	0.0	0.0	0.0
Insignificant Activities ⁽²⁾	0.35	0.87	0.1	1.81	8.25	9.82	0.35 (single) 0.516 (total)
Total PTE After Issuance	1.56 1.57	2.08 2.09	0.1	26.81	8.25	9.82	< 10 (single) < 25 (total)

Notes: (1) Reflects limited potential emissions from paint spray booth to make the requirements of 326 IAC 8-1-6 not applicable.
 (2) Insignificant Activities consist of natural gas combustion units (Microturbine, CU-1, CU-2, CU-7, ~~CU-9~~, CU-10, CU-11, and CU-12, CU-13 and CU-14) and powder coating booths (PB-1, PB-02, PB-03, and PB-14). PTE of a single HAP, Hexane, from CU-13 and CU-14 is less than the PTE of any single HAP from all other Insignificant Activities.

OAQ/OES Revision 1:

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into the permit as follows:

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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.

OAQ/OES Revision 2:

Although there is a packed bed scrubber connected to the decorative chrome electroplating tanks, it is not used to demonstrate continuous compliance. As a result, whenever the packed bed scrubber is noted in the requirements, it should be stated that the requirement to operate the packed bed scrubber applies only if the packed bed scrubber is used to demonstrate continuous compliance. Therefore, in Condition

D.2.4(a), D.2.6(a), D.2.7(c) and D.2.9(a), (b), (c) and (d), additional wording is needed to clearly state “to demonstrate continuous compliance” as follows:

D.2.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tanks #20 and #58:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks #20 and #58, including the chemical wetting agent, the packed bed scrubber **whenever being used to demonstrate continuous compliance**, and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.2.6.

D.2.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks #20 and #58. The OMP shall specify the operation and maintenance criteria for tanks #20 and #58, the chemical wetting agent, the packed bed scrubber if being used **to demonstrate continuous compliance**, and monitoring equipment **and** shall include the following elements:

D.2.7 Performance Testing [326 IAC 2-1.1-11] [326 IAC 2-8-5(a)(1)&(4)] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

- (a) A performance test demonstrating initial compliance for tanks #20 and # 58 was performed on January 30, 1996.

During the initial performance test conducted on January 30, 1996, it was determined that the total chromium concentration of each stack ID # 5 and 16, using Method 306, Appendix A of 40 CFR 63, was 0.0022 mg/dscm.

- (b) The Permittee is not required to further test tanks #20 and #58 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, or OES, compliance with the limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of tanks #20 and #58, the chemical wetting agent, the packed bed scrubber **when used to demonstrate continuous compliance**, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

D.2.9 Record Keeping Requirements [326 IAC 2-8-5(3)] [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.2.3, D.2.4 and D.2.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the chemical wetting agent, the packed bed scrubber system whenever being used **to demonstrate continuous compliance**, and monitoring equipment to document that the inspection and maintenance required by Conditions D.2.7 and D.2.8 have taken place. The record can take the form of a checklist and should identify the following:
 - (1) The device inspected;
 - (2) The date of inspection;

- (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
- (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks #20 and #58, the packed bed scrubber **whenever being used to demonstrate continuous compliance** and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks #20 and #58, the packed bed scrubber **whenever being used to demonstrate continuous compliance** and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks #20 and #58, the packed bed scrubber **whenever being used to demonstrate continuous compliance** and monitoring equipment as indicated by monitoring data collected in accordance with this condition.

OAQ/OES Revision 3:

Condition D.2.10(c) requires that an annual Ongoing Compliance Status report be prepared and maintained. In order to clarify when this report shall be completed, the following change is made to Condition D.2.10(c):

D.2.10 Reporting Requirements [326 IAC 2-8-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

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

- (c) **Ongoing Compliance Status Report**
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks #20 and #58 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks #20 and #58 are located at site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ, and OES, upon request.

- (1) The Ongoing Compliance Status Report shall be completed **within thirty (30) days from the date the report period ends and shall be completed** according to the following schedule except as provided in paragraph (c)(2).
 - (A) The first report shall cover the period from the issuance date of this permit to December 31 of the year in which the permit is issued.
 - (B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.

OAQ/OES Revision 4:

Marion County has been classified as nonattainment for PM2.5 (by U.S.EPA in Federal Register Notice 70 FR 943, effective April 5, 2005). Therefore, PM2.5 emissions were reviewed pursuant to the requirements for nonattainment new source review. There have been no modifications or revisions to this source that were major modifications for PM2.5 pursuant to nonattainment new source review requirements. This Significant Permit Revision, which adds the Insignificant Activity paint rack burn off ovens, Oven CU-13 and Oven CU-14, does not increase the potential to emit PM2.5 of this source such that the source is a major source, pursuant to nonattainment new source review requirements. Therefore, nonattainment new source review requirements for PM2.5 are not applicable to the source. However, a revised County Attainment status table and a revised Condition A.1 of SPR097-20272-00050, as of April 5, 2005, is as follows:

Pollutant	Status
PM-10	Unclassifiable
PM2.5	Nonattainment
SO ₂	Maintenance attainment
NO _x	Attainment
1-hour Ozone	Maintenance attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	unclassifiable

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source relating to the operation of surface coating of miscellaneous metal parts with powders, decorative chromium electroplating and metal trimming and stamping of architectural hardware products.

Authorized Individual: Environmental Manager
 Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 General Source Phone: (317) 613 8944
 SIC Code: 3442, 3446, 3469, 3471 and 3479
 County Location: Marion
 Source Location Status: Nonattainment for ozone under the 8-hour standard,
Nonattainment for PM2.5,
 Attainment for all other criteria pollutants
 Source Status: Federally Enforceable State Operating Permit (FESOP)
 Minor Source, under PSD Rules;
Minor Source, under Emission Offset
 Minor Source, Section 112 of the Clean Air Act

OAQ/OES Revision 5:

The signature box on the title page of SPR097-20272-00050 has changed as follows:

First Significant Permit Revision No.: 097-20272-00050	Conditions affected: Title Page; A.1, A.2(b),(c) & (d); A.3(r)(2), (3),(5)&(7); B.23; B.24; C.14; D.1.4; D.1.7(a); D.1.8(b); D.2(b) & (c); D.2.3(b)(2) & (b)(3); D.2.4(a); D.2.6(a); D.2.7(c); D.2.8(a); D.2.9; D.2.10(c); D.3.1; D.3.3; D.4(e); D.4(e)(7); D.4.3; D.4.4; D.4.5; D.4.6; D.4.7; Ongoing Compliance Status Report form
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<p>Issued by:</p> <p>Felicia A. Robinson Manager of Environmental Planning John B. Chavez, Administrator Office of Environmental Services</p>	<p>Issuance Date:</p>
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Company Name: IR Von Duprin
Address City IN Zip: 2720 Tobey Drive, Indianapolis, Indiana
Permit No.: F097-16154-00050
Significant Permit Revision No.: 097-20272-00050
Reviewer: M. Caraher
Date: 04/04/05

Polishing Unit (PU 1) (vents indoor)

2 hand polishing units
 8 hour shift capacity of each hand Robotic polishing Unit
 240 units weighing
 0.309 pounds per unit

Controlled by Torit Baghouse 1A

6.5 pounds dust (1) collected in 2520 operating hours
 99.00% baghouse efficiency

Maximum process rate (lb/hr) 18.54

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	0.562	5.21E-03	2.28E-02	5.21E-05	2.28E-04
VOC emission factor (%)	0	0	0	0	0

(1) PU 1 previously had a total process weight rate of 9.27 lb/hr and total of 6.5 lbs dust was collected.
 PM/PM10 emission factor (lb/ton) = 6.5 lbs (dust collected) / 0.99 (baghouse efficiency) / (9.27 lb/hr x 2520 actual operating hours) / 2000 (lb/ton)

Polishing Unit (PU 3) (vents indoor)

1 robotic polishing unit
 8 hour shift capacity of each Robotic polishing Unit
 200 units weighing
 1.749 pounds per unit

Controlled by Torit Baghouse 3

6533 pounds dust (2) collected in 2520 operating hours
 99.00% baghouse efficiency

Maximum process rate (lb/hr) 43.725

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	119.778	2.62	11.47	0.026	0.115
VOC emission factor (%)	0	0	0	0	0

(2) PU 3 has total process weight rate of 43.73 lb/hr and total of 6533 lbs dust is collected.
 PM/PM10 emission factor (lb/ton) = 6533 lbs (dust collected) / 0.99 (baghouse efficiency) / (43.73 lb/hr x 2520 actual operating hours) / 2000 (lb/ton)

Polishing Unit (PU 4) (vents indoor)

1 buffing unit
 8 hour shift capacity of each buffing Unit
 240 units weighing
 0.524 pounds per unit

Controlled by Torit Baghouse 4

99.00% pounds dust (1) collected in 1920 operating hours
 baghouse efficiency

Maximum process rate (lb/hr) 15.72

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
	**				
PM/PM10 emission factor (lb/ton)	42.09	3.31E-01	1.45E+00	3.31E-03	1.45E-02
VOC emission factor (%)	0	0	0	0	0

** PM/PM10 emission factor (lb/ton) = PM emission factor of 42.09 for PU 4 is provided by the source and is not based on the amount dust collected.

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Date: 04/04/05

Polishing Unit (PU 6A) (vents indoor) 7 polishing units
 8 hour shift capacity of each polishing Unit
 240 units weighing
 0.524 pounds per unit

Controlled by Torit Baghouse 6A 23270 pounds dust (4) collected in 1920 operating hours
 99.00% baghouse efficiency

Combined Maximum process rate for units 6A, 6B and 8 (lb/hr) 581.66
 Maximum process rate for unit 6A (lb/hr) 110

	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	42.094	2.32	10.14	0.10
VOC emission factor (%)	0	0	0	0

Polishing Unit (PU 6B) (vents indoor) 26 Hand polishing units
 1 Robotic Polishing unit
 8 hour shift capacity of each polishing Unit
 240 units weighing
 0.524 pounds per unit for hand polishing units
 0.309 pounds per unit for Robotic polishing unit

Controlled by Torit Baghouse 6B 23270 pounds dust (4) collected in 1920 operating hours
 99.00% baghouse efficiency

Combined Maximum process rate for unit 6B (lb/hr) 418
 Maximum process rate for unit 6B (Hand) (lb/hr) 408.7
 Maximum process rate for unit 6B (Robotic) (lb/hr) 9.3

	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton) Hand	42.094	8.60	37.68	0.38
PM/PM10 emission factor (lb/ton) Robotic (5)	0.562	0.00	0.01	0.00
Total PM/PM10 emissions		8.60	37.69	0.38
VOC emission factor (%)	0	0	0	0

Polishing Unit (PU 8) (vents indoor) 6 robotic polishing units
 8 hour shift capacity of each Robotic polishing Unit
 240 units weighing
 0.524 pounds per unit

1 buffing unit
 8 hour shift capacity of each polishing Unit
 220 units weighing
 0.95 pounds per unit

Controlled by Torit Baghouse 8 23270 pounds dust (4) collected in 1920 operating hours
 99.00% baghouse efficiency

Combined Maximum process rate for units 6A, 6B and 8 (lb/hr) 581.66
 Maximum process rate for unit 8 (lb/hr) 120.445

	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	42.094	2.54	11.10	0.11
VOC emission factor (%)	0	0	0	0

(4) Polishing unit ID 6A, 6B, and 8 had a previous total process rate of 581.66 pounds per hour & a total for all 3 baghouses collected was 23270 pounds
 PM/PM10 emission factor (lb/ton) = 23270 lbs (dust collected) / 0.99 (baghouse efficiency) / (581.66 lb/hr x 1920 actual operating hours) / 2000 (lb/ton)
 (5) 0.562 lbs/ton was the previous emission factor established for Robotic polishing in PU-1

Total for all Insignificant Activity Polishing Units Combined (PU-1, PU-3, PU-4, PU-6A & PU-8)

	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10	7.48	32.76	0.08	0.34
VOC	0	0	0	0

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Date: 01/21/05

Polishing Unit (PU 6A) (vents indoor)

7 polishing units
 8 hour shift capacity of each Robotic polishing Unit
 240 units weighing
 0.524 pounds per unit

Controlled by Torit Baghouse 6A 23270 pounds dust (3) collected in 1920 operating hours
 99.00% baghouse efficiency

Maximum process rate for unit 6A 110.04

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	42.094	2.32	10.14	2.32E-02	1.01E-01
VOC emission factor (%)	0	0	0	0	0

(3) Polishing unit ID 6A, 6B, and 8 had a previous total process rate of 581.66 pounds per hour & a total for all 3 baghouses collected was 23270 pounds
 PM/PM10 emission factor (lb/ton) = 23270 lbs (dust collected) / 0.99 (baghouse efficiency) / (581.66 lb/hr x 1920 actual operating hours) / 2000 (lb/ton)

Polishing Unit (PU 8) (vents indoor)

6 robotic polishing units
 8 hour shift capacity of each Robotic polishing Unit
 240 units weighing
 0.524 pounds per unit

1 robotic polishing unit
 8 hour shift capacity of each Robotic polishing Unit
 220 units weighing
 0.95 pounds per unit

Controlled by Torit Baghouse 8 23270 pounds dust (4) collected in 1920 operating hours
 99.00% baghouse efficiency

Maximum process rate for unit 8 120.45

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	42.094	2.54	11.10	2.54E-02	1.11E-01
VOC emission factor (%)	0	0	0	0	0

(4) Polishing unit ID 6A, 6B, and 8 have total process rate of 581.66 pounds per hour & a total for all 3 baghouses collected was 23270 pounds
 PM/PM10 emission factor (lb/ton) = 23270 lbs (dust collected) / 0.99 (baghouse efficiency) / (581.66 lb/hr x 1920 actual operating hours) / 2000 (lb/ton)

Total for all Insignificant Activity Polishing Units Combined (PU-1, PU-3, PU-4, PU-6A & PU-8)

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10		7.81	34.20	0.08	0.34
VOC		0	0	0	0

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: IR Von Duprin
Address City IN Zip: 2720 Tobey Drive, Indianapolis, Indiana
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Reviewer: M. Caraher
Date: 11/05/04

Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Orr & Sembower Boiler (CU-1)	5.0	
Dunham Bush Boiler (CU-2)	5.0	
Mullion Curing Oven (CU-7)	0.8	
Kolene Paint Stripper burner (CU-9)	4.8	
Two (2) Paint Rack Burnoff Ovens	1.9	16.6
Powdercoat dry off oven (CU-10)	1.0	
Powder coat curing oven (CU-11)	2.5	
Powder coat curing oven (CU-12)	2.5	
Cogeneration Unit (generator/water heater)	0.95	
	19.6	172.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.2	0.7	0.1	8.6	0.5	7.2
Potential Emission in tons/yr of Paint Rack Burn off ovens	0.0	0.1	0.0	0.8	0.0	0.7

*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

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

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

(SUPPLEMENT D 3/98)

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

HAPs Emissions

**Company Name: IR Von Duprin
Address City IN Zip: 2720 Tobey Drive, Indianapolis, Indiana
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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	1.807E-04	1.033E-04	6.455E-03	1.549E-01	2.926E-04
Potential Emission in tons/yr of Paint Rack Burn off ovens	1.748E-05	9.986E-06	6.242E-04	1.498E-02	2.829E-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	Combined Total
Potential Emission in tons/yr	4.303E-05	9.467E-05	1.205E-04	3.270E-05	1.807E-04	1.624E-01
Potential Emission in tons/yr of Paint Rack Burn off ovens	4.161E-06	9.154E-06	1.165E-05	3.162E-06	1.748E-05	1.571E-02

Methodology is the same as page 1.

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

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Date: 01/21/05

Polishing Unit (PU 1) (vents indoor)

3 polishing units
 8 hour shift capacity of each Robotic polishing Unit
 240 units weighing
 0.309 pounds per unit

Controlled by Torit Baghouse 1A
 6.5 pounds dust (1) collected in 2520 operating hours
 99.00% baghouse efficiency

Maximum process rate (lb/hr) 27.81

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	0.562	7.81E-03	3.42E-02	7.81E-05	3.42E-04
VOC emission factor (%)	0	0	0	0	0

(1) PU 1 had a previous total process weight rate of 9.27 lb/hr and total of 6.5 lbs dust is collected.
 PM/PM10 emission factor (lb/ton) = 6.5 lbs (dust collected) / 0.99 (baghouse efficiency) / (9.27 lb/hr x 2520 actual operating hours) / 2000 (lb/ton)

Polishing Unit (PU 3) (vents indoor)

1 robotic polishing units
 8 hour shift capacity of each Robotic polishing Unit
 200 units weighing
 1.749 pounds per unit

Controlled by Torit Baghouse 3
 6533 pounds dust (2) collected in 2520 operating hours
 99.00% baghouse efficiency

Maximum process rate (lb/hr) 43.725

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	119.78	2.62	11.47	0.03	0.11
VOC emission factor (%)	0	0	0	0	0

(2) PU 3 has total process weight rate of 43.73 lb/hr and total of 6533 lbs dust is collected.
 PM/PM10 emission factor (lb/ton) = 6533 lbs (dust collected) / 0.99 (baghouse efficiency) / (43.73 lb/hr x 2520 actual operating hours) / 2000 (lb/ton)

Polishing Unit (PU 4) (vents indoor)

1 Buffing unit
 8 hour shift capacity of each Robotic polishing Unit
 240 units weighing
 0.524 pounds per unit

Controlled by Torit Baghouse 4
 ** pounds dust (1) collected in 1920 operating hours
 99.00% baghouse efficiency

Maximum process rate (lb/hr) 15.72

		Uncontrolled Emissions		Controlled Emissions	
		lb/hr	ton/yr	lb/hr	ton/yr
PM/PM10 emission factor (lb/ton)	**	42.09	0.33	1.45	3.31E-03
VOC emission factor (%)		0	0	0	0

** PM/PM10 emission factor (lb/ton) = PM emission factor of 42.09 for PU 4 is provided by the source and is not based on the amount dust collected.