

March 24, 2005

Certified Mail 7000 0600 0023 5187 1875

J. Michael Raymond, President  
R & S Plating, Inc.  
2302 Bloyd Avenue  
Indianapolis, IN 46218

Re: Fourth Notice Only Change 097-20764-00325  
to Minor Source Operating Permit 097-11695-  
00325

Dear Mr. Raymond:

R & S Plating, Inc. was issued a Minor Source Operating Permit on October 5, 2000 for a hard chromium electroplating operation. A First Notice Only Change 097-14405-00325 was issued on September, 19, 2001, a Second Notice Only Change 097-15469-00325 was issued on March 1, 2002, and a Third Notice Only Change 097-18789-00325 was issued on June 14, 2004. An application was received February 14, 2005 requesting an adjustment to Condition C.10 Pressure Gauge and Other Instrument Specifications.

Pursuant to Condition C.10(c), the Permittee may request the use of a gauge that does not meet the specifications outlined in C.10(a) and/or (b) provided that the Permittee can demonstrate an alternative gauge will adequately ensure compliance with permit conditions requiring the measurement of those parameters. A discussion outlining the facts and data considered by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) when approving the alternative gauges at R & S Plating, Inc. can be found in the attached Technical Support Document.

Pursuant to the provisions of 326 IAC 2-6.1-6(d) the Minor Source Operating Permit is hereby amended as follows (Bolded language has been added and the language with strikeout has been deleted):

C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

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- (a) Whenever a condition in this permit requires the measurement of total static 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 ten~~ **ten** percent (~~20~~ **10**%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading unless otherwise specified in this permit.
- (b) Whenever a condition in this permit requires the measurement of a temperature or hoist speed, 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 unless otherwise specified in this permit.
- (c) The Permittee may request the IDEM, OAQ and OES 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.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Amanda Hennessy at (317) 327-2510.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez  
Administrator

Enclosure: Revised Permit  
Technical Support Document  
Notice of Decision

ajh

cc: Files  
Permits - Amanda Hennessy  
Compliance - Matt Mosier  
U.S. EPA, Region V  
Mindy Hahn, IDEM OAQ  
Marion County Health Department

# MINOR SOURCE OPERATING PERMIT

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

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

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

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

Operation Permit No.: MSOP 097-11695-00325	
Issued by:  Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date: September 5, 2000  Expiration Date: September 7, 2005

First Notice Only Change, 097-14505-00325, issued September 19, 2001  
Second Notice Only Change, 097-15469-00325, issued March 1, 2002  
Third Notice Only Change, 097-18789-00325, issued June 14, 2004

Fourth Notice Only Change: 097-20764-00325	Condition Affected: C.10
Issued by:  Original Signed by John B. Chavez  John B. Chavez Administrator	Issuance Date: March 24, 2005  Expiration Date: September 7, 2005

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

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

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The Permittee owns and operates a stationary hard chrome plating process.

Authorized Individual: President  
Source Address: 2302 Boyd Ave., Indianapolis, IN 46218  
Mailing Address: 2302 Boyd Ave., Indianapolis, IN 46218  
Phone Number: 317-925-2396  
SIC Code: 3471  
County Location: Marion  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit

### A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 17,640,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #1, equipped with a packed-bed scrubber/mesh pad system as controls, equipped with a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;
- (b) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 23,520,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #2, equipped with a packed-bed scrubber/mesh pad system as controls, equipped with a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;
- (c) One (1) cold cleaner degreaser, utilizing one (1) gallon of mineral spirits a year, without a remote solvent reservoir, identified as Mineral Spirits;
- (d) One (1) cold cleaner degreaser, utilizing 70 gallons of MEK (2-Butanone) a year, without a remote solvent reservoir, identified as MEK;
- (e) Three (3) natural gas fueled space heaters, with a combined maximum heat input rate of 0.29 million Btu per hour, exhausting to stacks 9, 10, and 8, and identified as Space Heaters;
- (f) One (1) natural gas fueled parts bake oven, with a maximum heat input rate of 0.02 million Btu per hour, identified as Parts Bake Oven;
- (g) One natural gas fueled burner, with a maximum heat input rate of 0.02 million Btu per hour, identified as Burner.

## **SECTION B GENERAL CONDITIONS**

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

### **B.1 Permit No Defense [IC 13]**

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

### **B.2 Definitions**

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

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

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

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.5 Modification to Permit [326 IAC 2]**

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

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

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and 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 an "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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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

Indianapolis OES

Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

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

- (c) The Permittee shall notify the OAQ and OES within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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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, OES, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) 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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)] (Mandatory)**

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, and OES, Air Permits, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.
- (d) 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.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

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- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
  
- (b) The Permittee may call the following telephone number: 317-327-2234, to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

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

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

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3** Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

**C.4** 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.5** 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 regu-

lated 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 OAQ Administrator 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

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

- (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) 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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

## Testing Requirements

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

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

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

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify the IDEM, OAQ and OES of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES no later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ and OES, if the source submits to IDEM, OAQ and OES a reasonable written explanation no 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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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

### C.8 Compliance Monitoring [326 IAC 2-1.1-11]

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

legally required shall be implemented immediately after the permit issuance.

**C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) Whenever a condition in this permit requires the measurement of total static 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 ten percent (10%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading unless otherwise specified in this permit.
- (b) Whenever a condition in this permit requires the measurement of a temperature or hoist speed, 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 unless otherwise specified in this permit.
- (c) The Permittee may request the IDEM, OAQ and OES 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.

**C.11 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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 and OES, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit 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 and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

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

**Record Keeping and Reporting Requirements**

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

---

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

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

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 General Record Keeping Requirements [326 IAC 2-6.1-2-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner and/or OES Administrator make a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

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

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

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar

R&S Plating, Inc  
Indianapolis, Indiana  
Permit Reviewer: Boris Gorlin

Fourth Notice Only Change  
Modified by: AJH

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MSOP: 097-11695-00325

years.

## SECTION D.1

## EMISSION UNITS OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Chromium Electroplating Operations

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

- (a) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 17,640,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #1, equipped with a packed-bed scrubber/composite mesh-pad system as controls, equipped with a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2;
- (b) One (1) hard chromium electroplating operation with a maximum cumulative rectifier capacity of 23,520,000 Ampere-hours consisting of: One (1) hard chromium electroplating tank, identified as HC #2, equipped with a packed-bed scrubber/composite mesh-pad system as controls, equipped with a composite mesh-pad as a common control, and exhausting to one (1) stack, identified as Stack 2.

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

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

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N. The permittee shall comply with the requirements of this condition on and after the compliance date for the tanks HC #1 and HC #2.

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

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tanks HC #1 and HC #2. A copy of this rule is attached. The permittee shall comply with the requirements of this condition on and after the compliance date for the tanks HC #1 and HC #2.

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

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) The hard chromium electroplating tanks, identified as tanks HC #1 and HC #2 above, are considered a small, existing hard chromium electroplating operation. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the hard chromium electroplating tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.03 mg/dscm [ $1.3 \times 10^{-5}$  gr/dscf].

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

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

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks HC #1 and HC #2, including the packed-bed scrubber/composite mesh-pad system, and composite mesh-pad, and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.

- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.
- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ and OES, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ and OES may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAQ and OES finds that the plan:
  - (1) Does not address a malfunction or period of excess emissions that has occurred;
  - (2) Fails to provide for the operation of tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh pad system, and composite mesh pad, and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or,
  - (3) Does not provide adequate procedures for correcting malfunction process equipment, packed-bed scrubber/composite mesh pad system, and composite mesh pad, and monitoring equipment or other causes of excess emissions as quickly as practicable.

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

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

A Preventive Maintenance Plan (PMP), in accordance with Section B-Preventive Maintenance Plan, of this permit, is required for the tanks HC #1 and HC #2 and the packed-bed scrubber/composite mesh pad system, and composite mesh pad system.

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

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks HC #1 and HC #2. The OMP shall specify the operation and maintenance criteria for the tanks, the packed-bed scrubber/composite mesh-pad system, and composite mesh-pad and monitoring equipment and shall include the following elements:
  - (1) For the packed-bed scrubber/composite mesh-pad system (PBS/CMP) and the composite mesh-pad:
    - (A) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
    - (B) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
    - (C) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.

- (D) Perform washdown of the composite mesh-pads in accordance with manufacturers recommendations.
- (2) A standardized checklist to document the operation and maintenance criteria for tanks HC #1 and HC #2, the air pollution control technique, packed-bed scrubber/composite mesh-pad system, composite mesh-pad, and the monitoring equipment.
- (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.
- (4) A systematic procedure for identifying malfunctions and periods of excess emissions of tanks HC #1 and HC #2, the air pollution control device, the add-on air pollution control device and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).
- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks HC #1 and HC #2, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ and ERMD.
- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ and OES for the life of tanks HC #1 and HC #2 or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ and OES for a period of five (5) years after each revision to the plan.

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

- D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344] [326 IAC 20-8-1]
- (a) A performance test demonstrating initial compliance for tanks HC #1 and HC #2 was performed on May 19, 1997. During the initial performance test, it was determined that the average overall pressure drop across the composite mesh pad system was 3.0+/-1 inches of water for HC #1, 4.5+/-1 inches of water for HC #2, and 2.5 +/- 1 inches of water for the common composite mesh-pad and the average outlet chromium concentration is 0.00239 mg/dscm.

- (b) The Permittee is not required to further test tanks HC #1 and HC #2 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, compliance with the limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C.8 Performance Testing.
- (c) Any change, modification, or reconstruction of the tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh-pad system, and composite mesh-pad, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C.8 Performance Testing.

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

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- (a) Pursuant to 40 CFR 63.343(c)(3) and 63.343(c)(1)(ii), when using a packed bed scrubber in conjunction with a composite mesh-pad system to comply with the limit specified in Condition D.1.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that the hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within  $3.0 \pm 1$  inches of water column of the pressure drop value for HC #1, within  $4.5 \pm 1$  inches of water column of the pressure drop value for HC #2, and  $2.5 \pm 1$  inches of water for the common composite mesh-pad, as established during the initial performance test.
- (b) Tank operation or operating time is defined as that time when a part is in the tank and the rectifier is turned on. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time.

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

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

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The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C.14 General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the packed-bed scrubber/composite mesh-pad system, and composite mesh-pad system and monitoring equipment to document that the inspection and maintenance required by Conditions D.1.7 and D.1.9 have taken place. The record can take the form of a checklist and should identify the following:
  - (1) The device inspected;
  - (2) The date of inspection;
  - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
  - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh-pad system, and composite mesh-pad, and monitoring equipment.

- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh-pad system, and composite mesh-pad, and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks HC #1 and HC #2, the packed-bed scrubber/composite mesh-pad system, and composite mesh-pad and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (j) The total process operating time, as defined in Condition D.1.8(b), of each tank, during the reporting period.

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

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

- (a) Notifications:
  - (1) Initial Notifications  
The Permittee shall notify IDEM, OAQ and OES in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).
  - (2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.
    - (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 HC #1 and HC #2 shall be submitted to IDEM, OAQ, and ERMD immediately.
  - (3) Notification of Construction or Reconstruction  
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ and OES. In addition, the Permittee may not change, modify, or reconstruct tanks HC #1 and HC #2 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 CMP 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 HC #1 and HC #2 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 the initial performance test and 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 HC #1 and HC #2 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).
- (d) Because tanks HC #1 and HC #2 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 according to the following schedule except as provided in paragraphs (c)(2).
    - (A) The first report shall cover the period from the issuance date of this permit to December 31 of the year in which the permit is issued.
    - (B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.
  - (2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, 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.1.8(b) for the reporting period; or

- (B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.8(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 and 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.2

## EMISSION UNITS OPERATION CONDITIONS

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

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

- (c) One (1) cold cleaner degreaser, utilizing one (1) gallon of mineral spirits a year, without a remote solvent reservoir, identified as Mineral Spirits;
- (d) One (1) cold cleaner degreaser, utilizing 70 gallons of MEK (2-Butanone) a year, without a remote solvent reservoir, identified as MEK;

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip each cleaner with a cover;
- (b) Equip the cleaners with a emissions unit for draining cleaned parts;
- (c) Close the degreaser covers whenever parts are not being handled in the cleaners;
- (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.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser emissions unit shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreasers with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreasers with a emissions unit for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage emissions unit must be internal such that articles are enclosed under

the cover while draining. The drainage emissions unit may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreasers with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>o</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>o</sup>F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreasers.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

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

- (e) Three (3) natural gas fueled space heaters, with a combined maximum heat input rate of 0.29 million Btu per hour, exhausting to stacks 9, 10, and 8, and identified as Space Heaters;
- (f) One (1) natural gas fueled parts bake oven, with a maximum heat input rate of 0.02 million Btu per hour, identified as Parts Bake Oven;
- (g) One natural gas fueled burner, with a maximum heat input rate of 0.02 million Btu per hour, identified as Burner.

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

There are no applicable requirements.

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

**CHROMIUM ELECTROPLATING NESHAP  
ONGOING COMPLIANCE STATUS REPORT**

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

Tank ID #: HC #1 and HC #2  
Type of process: Hard  
Monitoring Parameter: composite mesh-pad system  
Parameter Value: shall be operated within  $\pm 1$  inches of water column of the pressure drop value established during the initial performance test  
Limits: Total chromium concentration may not exceed .01 mg/dscm

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

Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

**This form consists of 2 pages**

**Page 1 of 2**

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

<b>MAJOR AND AREA SOURCES: CHECK ONE</b>
<input checked="" type="radio"/> NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
<input type="radio"/> 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:			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

ATTACH A SEPARATE PAGE IF NEEDED

<b>CHECK IF EITHER OR BOTH CONDITIONS WERE MET DURING THE REPORTING PERIOD:</b>
<input checked="" type="radio"/> the total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period, or:
<input checked="" type="radio"/> the total duration of malfunctions of add-on pollution control device and monitoring equipment is 5 percent (5%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period.

## CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

Page 2 of 2

ATTACH A SEPARATE PAGE IF NEEDED

CHECK IF EITHER OR BOTH CONDITIONS WERE MET DURING THE REPORTING PERIOD:

- the total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period, or:
- the total duration of malfunctions of add-on pollution control device and monitoring equipment is 5 percent (5%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period.

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**

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES, AIR COMPLIANCE**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	<b>R&amp;S Plating, Inc.</b>
<b>Address:</b>	<b>2302 Bloyd Ave.</b>
<b>City:</b>	<b>Indianapolis</b>
<b>Phone #:</b>	<b>(317) 925-2396</b>
<b>MSOP #:</b>	<b>097-11695-00325</b>

I hereby certify that R&S Plating, Inc. is  
still in operation.    no longer in operation.

I hereby certify that R&S Plating, Inc. is  
in compliance with the requirements of MSOP 097-11695-00325.  
not in compliance with the requirements of MSOP 097-11695-00325.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

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

**MINOR SOURCE OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

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

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY, COMPLIANCE DATA SECTION**  
FAX NUMBER - 317-233-5967  
**and**  
**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES, AIR COMPLIANCE**  
FAX NUMBER - 317-327-2274

**MALFUNCTION REPORT**

PAGE 1 OF 2

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Technical Support Document (TSD) for a Notice Only Change to a Minor Source  
Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>R &amp; S Plating, Inc.</b>
<b>Source Location:</b>	<b>2302 Bloyd Avenue, Indianapolis, IN 46218</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>3471</b>
<b>Operation Permit No.:</b>	<b>097-11695-00325</b>
<b>Operation Permit Issuance Date:</b>	<b>October 5, 2000</b>
<b>Permit Modification No.:</b>	<b>097-20764-00325</b>
<b>Permit Reviewer:</b>	<b>Amanda Hennessy</b>

The Indianapolis Office of Environmental Services (OES) and Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) have reviewed a Notice Only Change application from R & S Plating, Inc. relating to gauge scale requirements as outlined in Condition C.10 of the Minor Source Operating Permit.

**Explanation of the Request**

Condition C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] was added in the Third Notice Only Change issued on June 14, 2004. Since Notice Only Changes do not have Public Comment periods, the source had no opportunity to comment on the language of the condition prior to issuance of the amended permit.

Condition C.10(a) requires that the expected normal pressure drop reading shall be no less than 20% of full scale. Pursuant to Condition C.10(c), the Permittee may request the use of a gauge that does not meet these specifications provided that the Permittee can demonstrate an alternative gauge will adequately ensure compliance with permit conditions requiring the measurement of other parameters. In this amendment, R & S Plating is requesting a revision to Condition C.10 Pressure Gauge and Other Instrument Specifications to accommodate existing gauges.

The pressure drop requirements in Condition D.1.8 of the permit are: 3.0 " 1 inches of water for HC#1, 4.5 " 1 inches of water for HC#2, and 2.5 " 1 inches of water for the common composite mesh-pad. In order to meet the current reading of C.10(a), the gauge for HC#1 would need to have a scale from 0 to 15 or less, the gauge for HC#2 would need to have a scale of 0 to 22.5 or less and the gauge for the common composite mesh-pad would need to have a scale of 0 to 12.5 or less.

R & S Plating currently utilizes three gauges and has one spare gauge as a back up. Each of these gauges has a scale of 0 to 25 inches of water. Therefore, for HC#1 the existing gauge provides for 12% of full scale, for HC#2 the existing gauge provides for 18% of full scale, and for the common composite mesh pad, the existing gauge provides for 10% of full scale.

**Justification for the Revision**

The existing gauges utilized to measure pressure drop across the composite mesh pads have a scale from 0 to 25 with marks at each half digit (for example, there are marks at 0.5, 1, 1.5, 2, 2.5, etc.). Therefore, readings can be made to an appropriate decimal place. R & S Plating has stated

that gauges with a 1 to 10 scale may lead to more needle vibration, making the gauges more difficult to read and more subject to interpretation during readings.

The existing gauges were in place when the performance test for 40 CFR 63, Subpart N was performed. The average chromium outlet concentration was 0.00239 mg/dscm at the pressure drops indicated above and in the permit. The NESHAP limit is an outlet chromium concentration of 0.03 mg/dscm.

R & S Plating has demonstrated that the existing gauges will adequately ensure compliance with permit conditions requiring the measurement of pressure drop across the composite mesh pads.

Pursuant to 326 IAC 2-6.1-6(d)(9), this change to the permit is a notice only change because it is a revision of a condition related to a monitoring requirement specified in an applicable requirement.

### Recommendation

The staff recommends to the Commissioner that the Notice Only Change 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 February 14, 2005. Additional information was provided via phone conversations on February 24, 2005 and March 3, 2005.

### Changes to the Permit

Based upon the request and adequacy demonstration, IDEM, OAQ and OES are making the following change to the Minor Source Operating Permit:

#### C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

- (a) Whenever a condition in this permit requires the measurement of total static 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~~ **ten** percent (~~20~~ **10**%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading unless otherwise specified in this permit.
- (b) Whenever a condition in this permit requires the measurement of a temperature or hoist speed, 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 unless otherwise specified in this permit.
- (c) The Permittee may request the IDEM, OAQ and OES 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.

### Conclusion

This Notice Only Change shall amend the conditions of the Minor Source Operating Permit, **097-20764-00325**.