



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: October 27, 2005  
RE: Reckon Plating, Inc. / 003-21544-00315  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 1/10/05



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## MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Reckon Plating, Inc.  
5300 South Hanna Street  
Fort Wayne, Indiana 46806**

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

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

|  |  |
|--|--|
| Operation Permit No.: MSOP 003-21544-00315   |  |
| Issued by: Original Signed By:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: October 27, 2005<br><br>Expiration Date: October 27, 2010 |

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

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

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The Permittee owns and operates a stationary decorative chromium electroplating operation that plates custom metal products.

Authorized Individual: Kashem Sarker, President  
Source Address: 5300 South Hanna Street, Fort Wayne, Indiana 46806  
Mailing Address: 5300 South Hanna Street, Fort Wayne, Indiana 46806  
General Source Phone: 260-744-4339  
SIC Code: 3471  
County Location: Allen  
Source Location Status: Nonattainment area for 8-Hour Ozone  
Attainment area for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and/or Emission Offset Rules;  
Minor Source, Section 112 of the Clean Air Act

### 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) decorative chromium electroplating tank, identified as DC-1, constructed in 1996, with a capacity of 80 gallons, using a wetting agent as control, and exhausting to one (1) stack, identified as stack No. 1.
- (b) One (1) decorative chromium electroplating tank, identified as DC-2, constructed in May 2004, with a capacity of 220 gallons, using a wetting agent as control, and exhausting to one (1) stack, identified as stack No. 1.
- (c) Three (3) acid copper tanks with a capacity of 180 gallons per tank.
- (d) Two (2) acid copper tanks with a capacity of 220 gallons per tank.
- (e) Two (2) acid copper tanks with a capacity of 500 gallons per tank.
- (f) One (1) acid copper tank with a capacity of 400 gallons.
- (g) Three (3) copper cyanide tanks with a capacity of 80 gallons per tank.
- (h) One (1) bright nickel tank with a capacity of 180 gallons.
- (i) One (1) bright nickel tank with a capacity of 500 gallons.
- (j) One (1) bright nickel tank with a capacity of 600 gallons.

## **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

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

**B.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
- 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 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]  
[IC 13-17-3-2] [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, 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)]**

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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 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 shall issue a revised permit.

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

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

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

**B.12 Credible Evidence [326 IAC 1-1-6]**

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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

### C.1 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.2 Opacity [326 IAC 5-1]

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

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

### C.3 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

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 2-7-1(34).

- (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

### C.4 Performance Testing [326 IAC 3-6]

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.5 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 U.S. EPA.

### **Compliance Monitoring Requirements**

#### **C.6 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 when operation begins.

#### **C.7 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.8 Compliance Response Plan - Preparation and Implementation**

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- (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 and Maintenance Plan (OMP) under 40 CFR 63, such plan shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ 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 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 timeframe 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 Operation and Maintenance Plan (OMP) the Permittee shall amend its Operation and Maintenance Plan (OMP) to include such response steps taken.

The OMP shall be submitted within the time frames specified by 40 CFR 63.342(f)(3).

- (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 Operation and Maintenance Plan (OMP); or
  - (2) If none of the reasonable response steps listed in the Operation and Maintenance Plan (OMP) 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from 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 a minor permit modification 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) 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.

### **Record Keeping and Reporting Requirements**

#### **C.9 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years

and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

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

C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [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
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does 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 years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) decorative chromium electroplating tank, identified as DC-1, constructed in 1996, with a capacity of 80 gallons, using a wetting agent as control, and exhausting to one (1) stack, identified as stack No. 1.
- (b) One (1) decorative chromium electroplating tank, identified as DC-2, constructed in May 2004, with a capacity of 220 gallons, using a wetting agent as control, and exhausting to one (1) stack, identified as stack No. 1.

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

### Emission Limitations and Standards

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

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

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

The provisions of the previous version 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 each decorative chromium electroplating tank, DC-1 and DC-2. In addition, pursuant to 40 CFR 63, Subpart N, the current version of the rule also applies to this source.

#### D.1.3 Chromium Emission Limitations [40 CFR 63.342(d)] [40 CFR 63.343(a)(1), (2)] [326 IAC 20-8]

- (a) The emission limitations in this condition apply only during tank operation and 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 the tanks DC-1 and DC-2 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 (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 ( $4.4 \times 10^{-6}$  gr/dscf)]; or
  - (2) Not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) as measured by a stalagmometer or thirty-five dynes per centimeter (35 dynes/cm) as measured by a tensiometer at any time during operation of tanks DC-1 or DC-2 when a chemical fume suppressant containing a wetting agent is used.

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

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The following work practice standards apply to tanks DC-1 and DC-2:

- (a) At all times, including periods of startup, shutdown, malfunction, the Permittee shall operate and maintain tanks DC-1 and DC-2, including the wetting agent 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 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, that 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 may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAQ finds that the plan:
  - (1) Does not address a malfunction that has occurred;
  - (2) Fails to provide for the operation of tanks DC-1 and DC-2, the wetting agent and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
  - (3) Does not provide adequate procedures for correcting malfunctioning process equipment, wetting agent, monitoring equipment or other causes of malfunction as quickly as practicable.
- (f) Pursuant to 40 CFR 63.342(f), based on the results of the determination made under paragraph (d), IDEM, OAQ and U.S. EPA may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAQ or U.S. EPA finds that the plan fails to provide for the proper operation of tanks DC-1 and DC-2, the wetting agent and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices.

The work practice standards that address operation and maintenance must be followed during malfunctions.

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

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the tanks DC-1 and DC-2 and any control devices.

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

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- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks DC-1 and DC-2. The OMP shall specify the operation and maintenance criteria for the tanks, the wetting agent and monitoring equipment and shall include the following elements:
  - (1) 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 DC-1 and DC-2, the wetting agent and monitoring equipment;
  - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
  - (4) A systematic procedure for identifying malfunctions of tanks DC-1 and DC-2, the wetting agent and monitoring equipment; and for implementing corrective actions to address such malfunctions.
- (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 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 DC-1 and DC-2, the wetting agent and the monitoring equipment, during similar malfunction events, and a program for corrective action for such events.
  - (d) If actions taken by the Permittee during periods of malfunction 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.
  - (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of the tanks DC-1 and DC-2, or until the tank is no longer subject to the provisions of 40 CFR 63.340. Additionally, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.

### **Compliance Determination Requirements**

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

Any change, modification, or reconstruction of tanks DC-1 or DC-2, the wetting agent or monitoring equipment may require performance testing conducted in accordance with 40 CFR 63.344 and Section C – Performance Testing.

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

#### **D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)] [40 CFR 63.343(c)(5)(ii) and (iii)] [40 CFR 63.341] [326 IAC 20-8]**

- (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 limits specified in Condition D.1.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tanks DC-1 and DC-2 at a surface tension greater than 45 dynes per centimeter as measured by a stalagmometer or 35 dynes per centimeter as measured by a tensiometer shall constitute noncompliance with the standards.

- (1) The Permittee shall monitor the surface tension of the electroplating bath during tank operation according to the following schedule:
    - (A) The surface tension shall be measured once every four (4) hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, Appendix A of this part.
    - (B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every four (4) hours of tank operation for the first forty (40) hours of tank operation after the compliance date. 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, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every forty (40) hours of tank operation.
    - (C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee had been monitoring a tank once every forty (40) hours and an exceedance occurs, subsequent monitoring would take place once every four (4) hours of tank operation. Once an exceedance does not occur for forty (40) hours of tank operation, monitoring can occur once every eight (8) hours of tank operation. Once an exceedance does not occur for forty (40) hours of tank operation on this schedule, monitoring can occur once every forty (40) hours of tank operation.
  - (2) Once a bath solution is drained from tank DC-1 or DC-2 and a new solution added, the original monitoring schedule of every four hours must be resumed, with a decrease in monitoring frequency allowed following the procedures in paragraphs (B) and (C) above.
- (b) Tank operation means the time in which current and/or voltage is being applied to a chromium electroplating tank or a chromium anodizing tank.

### **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]**

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

- (a) Inspection records for the monitoring equipment to document that the inspection and maintenance required by Conditions D.1.7 and D.1.8 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 DC-1, DC-2, and the monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction and/or period of excess emissions of tanks DC-1, DC-2, and the monitoring equipment.
- (d) Records of actions taken during periods of malfunction when such actions are inconsistent with the OMP.
- (e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (f) Test reports documenting results of all performance tests.
- (g) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (h) 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.
- (i) The total process operating time, as defined in Condition D.1.8(b), of each tank, during the reporting period.
- (j) Records of the date and time that the fume suppressants were added to the electroplating baths, and the amount and type of fume suppressant added.
- (k) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.10.
- (l) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

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]

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

- (a) Notifications:
  - (1) Initial Notifications:
    - (A) Notification of the actual date when construction of the chromium electroplating tank shall be submitted as soon as practicable to IDEM, OAQ.
    - (B) Notification of the actual date of startup of the chromium electroplating tank shall be submitted as soon as practicable to IDEM, OAQ.
  - (2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR 63, Subpart N.
    - (A) The NCS shall be submitted to IDEM, OAQ, and shall list for each tank the information identified in 40 CFR 63.347(e)(2).

- (B) The NCS for the chromium electroplating tanks DC-1 and DC-2 shall be submitted to IDEM, OAQ 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. In addition, the Permittee may not change, modify, or reconstruct tanks DC-1 or DC-2 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.
  - (A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).
  - (B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.
  - (C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks DC-1 or DC-2 serves as this notification.
  - (D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.
- (b) Ongoing Compliance Status Report  
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks DC-1 and DC-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).

Because tanks DC-1 and DC-2 are located at a site that is an area source of hazardous air pollutants (HAP), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ upon request.

  - (1) The Ongoing Compliance Status Report 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 start-up date of the emissions units to December 31 of the year in which the emissions units begin operation.
    - (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:
    - (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 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.
- (c) Pursuant to 40 CFR 63.340(e)(2), a source subject to Subpart N is also subject to the Title V permitting requirements. IDEM, OAQ has granted a deferral under this rule until December 9, 2004 for sources that are not located at a major source and are not otherwise required to obtain a Title V permit. Therefore, the Permittee must submit a Title V permit application by December 9, 2005. On March 25, 2005, U.S. EPA proposed to exempt all sources that are subject to a NESHAP, but are not major sources, from Title V permitting requirements. If that rule becomes final, the Permittee will not be required to submit a Title V permit application.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

|                      |                           |
|----------------------|---------------------------|
| <b>Company Name:</b> | Reckon Plating, Inc.      |
| <b>Address:</b>      | 5300 South Hanna Street   |
| <b>City:</b>         | Fort Wayne, Indiana 46806 |
| <b>Phone #:</b>      | 260-744-4339              |
| <b>MSOP #:</b>       | 003-21544-00315           |

I hereby certify that Reckon Plating, Inc. is

- still in operation.
- no longer in operation.

I hereby certify that Reckon Plating, Inc. is

- in compliance with the requirements of MSOP 003-21544-00315.
- not in compliance with the requirements of MSOP 003-21544-00315.

|                                       |
|---------------------------------------|
| <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> |
|                       |
|                       |
|                       |
|                       |
|                       |

**MALFUNCTION REPORT**

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

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

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

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM 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: \_\_\_\_/\_\_\_\_/19\_\_\_\_        \_\_\_\_\_ AM / PM

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

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19\_\_\_\_        \_\_\_\_\_ 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  
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
 CHROMIUM ELECTROPLATING AND ANODIZING NESHAP  
 ONGOING COMPLIANCE STATUS REPORT**  
 (Complete this form for each affected tank)

Source Name: Reckon Plating, Inc.  
 Source Address: 5300 South Hanna Street, Fort Wayne, Indiana 46806  
 Mailing Address: 5300 South Hanna Street, Fort Wayne, Indiana 46806  
 Part 70 Permit No.: MSOP 003-21544-00315

Tank ID #: DC-1 and DC-2  
 Type of process: Decorative Chromium Electroplating Operation  
 Monitoring Parameter: Surface tension of the electroplating bath  
 Parameter Value: 45 dynes per centimeter as measured by a stalagmometer or 35 dynes per centimeter as measured by a tensiometer.  
 Limits: Total chromium concentration may not exceed 0.01 mg/dscm if the chromium electroplating bath does not meet the parameter value listed above.

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 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: |

|  |   |
|--|---|
| <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). |

|   |     |     |     |
|---|-----|-----|-----|
| <b>AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:</b><br>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 |

|  |     |     |     |
|--|-----|-----|-----|
| <b>HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:</b><br>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**

- |          |  |
|----------|--|
| <b>9</b> | 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. |
| <b>9</b> | 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**

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

**Source Background and Description**

|  |  |
|--|--|
| <b>Source Name:</b>                    | Reckon Plating, Inc.                               |
| <b>Source Location:</b>                | 5300 South Hanna Street, Fort Wayne, Indiana 46806 |
| <b>County:</b>                         | Allen  |
| <b>SIC Code:</b>                       | 3471   |
| <b>Operation Permit No.:</b>           | MSOP 003-12421-00315                               |
| <b>Operation Permit Issuance Date:</b> | November 20, 2000                                  |
| <b>Permit Renewal No.:</b>             | 003-21544-00315                                    |
| <b>Permit Reviewer:</b>                | Chrystal Wagner                                    |

The Office of Air Quality (OAQ) has reviewed an application from Reckon Plating, Inc. relating to the operation of a decorative chromium electroplating operation.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) decorative chromium electroplating tank, identified as DC-1, constructed in 1996, with a capacity of 80 gallons, using a wetting agent as control, and exhausting to one (1) stack, identified as stack No. 1.
- (b) Two (2) copper cyanide tanks with a capacity of 80 gallons per tank.

**Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted emission units:

- (a) One (1) decorative chromium electroplating tank, identified as DC-2, constructed in May 2004, with a capacity of 220 gallons, using a wetting agent as control, and exhausting to one (1) stack, identified as stack No. 1.
- (b) Three (3) acid copper tanks with a capacity of 180 gallons per tank.
- (c) Two (2) acid copper tanks with a capacity of 220 gallons per tank.
- (d) Two (2) acid copper tanks with a capacity of 500 gallons per tank.
- (e) One (1) acid copper tank with a capacity of 400 gallons.
- (f) One (1) copper cyanide tank with a capacity of 80 gallons.
- (g) One (1) bright nickel tank with a capacity of 180 gallons.
- (h) One (1) bright nickel tank with a capacity of 500 gallons.

- (i) One (1) bright nickel tank with a capacity of 600 gallons.

### Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

MSOP 003-12421-00315 issued on November 20, 2000.

All conditions from the previous approval were incorporated into this permit, except those condition regarding to the following units:

- (a) Four (4) acid copper tanks with a capacity of 210 gallons per tank
- (b) Two (2) bright nickel tanks with a capacity of 210 gallons per tank

because these units are no longer at the source.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Stack Summary

| Stack ID | Operation                 | Height (ft) | Diameter (ft) | Flow Rate (acfm) | Temperature (°F) |
|----------|---------------------------|-------------|---------------|------------------|------------------|
| 1        | Tanks<br>DC-1 and<br>DC-2 | 12          | 2             | 3,700            | Ambient          |

### Recommendation

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

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

A complete application for the purposes of this review was received on August 1, 2005.

### Emission Calculations

Chromium emissions from the largest chromium electroplating source in Indiana are less than ten (10) tons per year. In comparison, Reckon Plating, Inc. is a much smaller source. Therefore, no HAP emission calculations were necessary for the chromium electroplating. Emission calculation were not included for the copper cyanide tanks because these emissions were minimal. Emissions from this source will be less than ten (10) tons per year. See Appendix A, pages 1 through 2, of this document for detailed particulate matter and nickel emissions calculations.

**Potential to Emit of the Source Before Controls**

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

| Pollutant       | Potential to Emit (tons/yr) |
|-----------------|-----------------------------|
| PM              | 0.03                        |
| PM-10           | 0.03                        |
| SO <sub>2</sub> | 0.00                        |
| VOC             | 0.00                        |
| CO              | 0.00                        |
| NO <sub>x</sub> | 0.00                        |

| HAP                | Potential to Emit (tons/yr) |
|--------------------|-----------------------------|
| Chromium Compounds | <10                         |
| Nickel             | <1                          |
| Total              | <25                         |

- (a) The potential to emit of all criteria pollutants are less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7, Part 70.
- (b) The potential to emit of any single HAP is less than ten (10) tons per year and/or the potential to emit of a combination of HAP is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7, Part 70.
- (c) This source consists of chromium electroplating tanks and is subject to 326 IAC 20-8, but not 326 IAC 2-5.5-1(b)(2), Registration, because this existing decorative chromium electroplating source uses hexavalent chromium instead of trivalent chromium, and the source emits less than major source thresholds (see (a) and (b) above). Therefore, the source is subject to the provisions of 326 IAC 2-6.1-3(a).

**County Attainment Status**

The source is located in Allen County.

| Pollutant       | Status        |
|-----------------|---------------|
| PM-10           | Attainment    |
| PM-2.5          | Attainment    |
| SO <sub>2</sub> | Attainment    |
| NO <sub>2</sub> | Attainment    |
| 1-Hr Ozone      | Attainment    |
| 8-Hr Ozone      | Nonattainment |
| CO              | Attainment    |
| Lead            | Attainment    |

- (a) Allen County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, NO<sub>2</sub>, SO<sub>2</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Allen County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (c) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review
- (d) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 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, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant       | Emissions (tons/yr) |
|-----------------|---------------------|
| PM              | <1                  |
| PM-10           | <1                  |
| SO <sub>2</sub> | <1                  |
| VOC             | <1                  |
| CO              | <1                  |
| NO <sub>x</sub> | <1                  |
| Single HAP      | <10                 |
| Combination HAP | <25                 |

- (a) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, no attainment regulated pollutant is emitted at a rate of 250 tons per year, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the unrestricted potential to emit of the source.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

- (c) any combination of HAP is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

### Federal Rule Applicability

- (a) The requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) are not included in this permit because these tanks do not store volatile organic liquids. There are not other NSPSs included in this permit.
- (b) Each decorative chromium electroplating tank, DC-1 and DC-2, is subject to the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 326 IAC 20, (40 CFR 63.340, Subpart N). This subpart was revised on July 19, 2004. However, pursuant to 326 IAC 1-1-3, the version of the rule referenced by 326 IAC 20-8 was the version in existence on July 1, 2004. Therefore, the July 19, 2004 amendments to the federal rule are not approved into the SIP, and the chromium electroplating facilities at this source are subject to both versions of the rule. The rule requirements for the previous version of the rule are specified under “326 IAC 20-8 (Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks)” the the “State Rule Applicability – Individual Facilities” section of this document. When the revised rule is incorporated into the SIP, the Permittee may apply for a revision to the permit to remove any requirements from the previous version of the rule that are not present in the updated version. All of the requirements of the sections of the federal rule that are applicable to this source are the same as the requirements listed under “326 IAC 20-8,” except for the following:
- (1) 40 CFR 63.342(f)(2)(ii)(B) now indicates that IDEM, OAQ and U.S. EPA may require that the Permittee make changes to the Operation and Maintenance Plan if IDEM, OAQ or U.S. EPA finds that the plan fails to provide for the proper operations of tanks DC-1 and DC-2, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good engineering practices. In the previous version of the rule, that section indicated that IDEM, OAQ and U.S. EPA may require that the Permittee make changes to the Operation and Maintenance Plan if the plan fails to provide for the operation of tanks DC-1 and DC-2, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good engineering practices. Both requirements will be included in the permit.
- (2) 40 CFR 63.343(c)(5) has also been revised to clarify the surface tension measurement to 45 dynes/cm as measured by a stalagmometer or 35 dynes/cm as measured by a tensiometer. This clarification will be included in the permit.

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

### **State Rule Applicability – Entire Source**

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential emissions of each attainment criteria pollutant are less than 250 tons per year. Therefore, this source, which is not one of the 28 listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

#### 326 IAC 2-3 (Emission Offset)

The unrestricted potential VOC and NO<sub>x</sub> emissions are less than 100 tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this decorative chromium electroplating source will emit less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAP. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program), and does not emit lead into the ambient air at or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Opacity Limitations)

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

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

### **State Rule Applicability – Individual Facilities**

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

Pursuant to 326 IAC 6-3-1(c)(6), this rule is not applicable to the chromium electroplating operations because a particulate limit for the electroplating is established in 326 IAC 20-8-1.

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

The chromium electroplating operations are required to comply with 40 CFR 63, Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Anodizing Tanks. Pursuant to 326 IAC 1-1-3, the version of the rule referenced was the version in existence on July 1, 2004. Therefore, the July 19, 2004 amendments to the federal rule are not approved into the SIP, and the chromium electroplating operations are subject to the previous version of the rule, as included in the initial MSOP. The requirements are as follows:

##### (a) Emissions Limitations

- (1) The emission limitations in this condition apply only during tank operation and 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.

- (2) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the tanks DC-1 and DC-2 by:
  - (A) 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 (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 ( $4.4 \times 10^{-6}$  gr/dscf)]; or
  - (B) Not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) at any time during operation of tanks DC-1 or DC-2 when a chemical fume suppressant containing a wetting agent is used.

(b) Work Practice Standards

The work practice standards, pursuant to 40 CFR 63.342(f)(1) and (2), apply to tanks DC-1 and DC-2 at all times, including periods of startup, shutdown, and malfunction. The Permittee shall operate and maintain tanks DC-1 and DC-2, including the wetting agent and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP).

(c) Operation and Maintenance Plan (OMP)

The Permittee shall prepare an Operation and Maintenance Plan (OMP) pursuant to 40 CFR 63.342(f)(3) for tanks DC-1 and DC-2.

(d) Performance Testing

- (1) An initial performance test is not required, pursuant to 40 CFR 63.343(b)(2), because each affected source, DC-1 and DC-2, is a decorative chromium electroplating tank that uses a wetting agent and complies with the applicable surface tension limit in 40 CFR 63, Subpart N.
- (2) Pursuant to 40 CFR 63.343(c)(5), the Permittee may comply with the surface tension limit in lieu of the performance test, provided the criteria under 40 CFR 63.343(b) are met.
- (3) Any change, modification, or reconstruction of tanks DC-1 or DC-2, the wetting agent or monitoring equipment may require performance testing conducted in accordance with 40 CFR 63.344 and Section C – Performance Testing.

(e) Monitoring to Demonstrate Continuous Compliance

- (1) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the electroplating bath to comply with the limits specified in 40 CFR 63.342(d), the Permittee shall monitor the surface tension of the electroplating baths. Operation of tanks DC-1 and DC-2 at a surface tension greater than 45 dynes per centimeter as measured by a stalagmometer or 35 dynes per centimeter as measured by a tensiometer shall constitute noncompliance with the standards.
- (2) Tank operation or operating time is defined as that time when a part is in the tanks and the rectifier is turned on. If the amount of time that no part is in the tank is fifteen (15) minutes or longer, that time is not considered operation 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 (15) minutes, that time between plating the two parts may be considered operating time.

(f) Record Keeping Requirements

The Permittee shall maintain records to document compliance with this rule using the forms provided with the permit. These records shall include a minimum of the following:

- (1) Inspection records for the monitoring equipment to document that the inspection and maintenance required have taken place. The record can take the form of a checklist and should identify the following:
  - (A) The device inspected;
  - (B) The date of inspection;
  - (C) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
  - (D) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (2) Records of all maintenance performed on tanks DC-1, DC-2, and the monitoring equipment.
- (3) Records of the occurrence, duration, and cause (if known) of each malfunction and/or period of excess emissions of tanks DC-1, DC-2, and the monitoring equipment.
- (4) Records of actions taken during periods of malfunction when such actions are inconsistent with the OMP.
- (5) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (6) Test reports documenting results of all performance tests.
- (7) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (8) 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.
- (9) The total process operating times of each tank, DC-1 and DC-2, during the reporting period.
- (10) Records of the date and time the fume suppressants (wetting agents) were added to the electroplating bath, and the amount and type added.
- (11) All documentation supporting the notifications and reports required.

(g) Reporting Requirements

- (1) Notifications:

- (A) Initial Notifications:
- (i) Notification of the actual date of construction of the chromium electroplating tank shall be submitted as soon as practicable to IDEM, OAQ.
  - (ii) Notification of the actual date of startup of the chromium electroplating tank shall be submitted as soon as practicable to IDEM, OAQ.
- (B) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR 63, Subpart N.
- (i) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
  - (ii) The NCS for tanks DC-1 and DC-2 shall be submitted to IDEM, OAQ immediately.
- (C) 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. In addition, the Permittee may not change, modify, or reconstruct tanks DC-1 or DC-2 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.
- (i) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).
  - (ii) 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.
  - (iii) 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 DC-1 or DC-2 serves as this notification.
  - (iv) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.

(2) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tanks DC-1 and DC-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).

Because tanks DC-1 and DC-2 are located at a site that is an area source of hazardous air pollutants (HAP), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ upon request.

- (A) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided below.
  - (i) The first report shall cover the period from the start-up date of the emissions units to December 31 of the year in which the emissions units begin operation.
  - (ii) 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.
- (B) If either of the following conditions is met, semiannual reports shall be prepared and submitted to IDEM, OAQ:
  - (i) 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
  - (ii) The total duration of malfunctions of the 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 semi-annually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (C) IDEM, OAQ 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.
- (h) Pursuant to 40 CFR 63.340(e)(2), a source subject to Subpart N is also subject to the Title V permitting requirements. IDEM, OAQ has granted a deferral under this rule until December 9, 2004, for sources that are not located at a major source and are not otherwise required to obtain a Title V permit. Therefore, the Permittee must submit a Title V permit application by December 9, 2005. On March 25, 2005, U.S. EPA proposed to exempt all sources that are subject to a NESHAP but are not major sources from Title V permitting requirements. If that rule becomes final, the Permittee will not be required to submit a Title V permit application.

### **Compliance Requirements**

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 in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

Compliance monitoring is required for the two (2) decorative chromium electroplating tanks, DC-1 and DC-2, in order to ensure effectiveness of the wetting agent at all times. Proper use of the wetting agent is necessary in order for the two (2) decorative chromium electroplating tanks, DC-1 and DC-2, to comply with 326 IAC 20-8 and 40 CFR 63, Subpart N. The following compliance monitoring conditions are applicable:

Pursuant to 326 IAC 20-8, when using a wetting agent in the electroplating bath to comply with the limits specified in the standard, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tanks DC-1 and DC-2 at a surface tension greater than 45 dynes per centimeter as measured by a stalagmometer or 35 dynes per centimeter as measured by a tensiometer shall constitute noncompliance with the standards.

## **Conclusion**

The operation of this decorative chromium electroplating operation shall be subject to the conditions of the Minor Source Operating Permit Renewal 003-21544-00315.

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Minor Source Operating Permit Renewal

**Source Name:** Reckon Plating, Inc.  
**Source Location:** 5300 South Hanna Street, Fort Wayne, Indiana 46806  
**County:** Allen  
**SIC Code:** 3471  
**Permit No.:** M003-21544-00315  
**Permit Reviewer:** Chrystal Wagner

On September 21, 2005, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Reckon Plating, Inc. had applied for a Minor Source Operating Permit (MSOP) renewal to operate a decorative chromium electroplating operation. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal 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 renewal should be issued as proposed.

No comments on the proposed Minor Source Operating Permit renewal were received.

Upon further review, OAQ has decided to make the following revision to the permit (**bolded** language has been added and ~~struck~~ language has been deleted). The Table of Contents has been modified to reflect this change.

### **Section B**

#### **OAQ Change B-1:**

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, IDEM has deleted paragraph (b) of Condition B.7 Preventive Maintenance Plan. The following changes have been made to Condition B.7:

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

- (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.~~

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

**Appendix A: Emissions Calculations  
Decorative Chromium Electroplating**

**Particulate Matter Emissions**

**Company Name:** Reckon Plating, Inc.  
**Address City IN Zip:** 5300 South Hanna Street, Fort Wayne, Indiana 46806  
**Permit Number:** MSOP 003-21544-00315  
**Pit ID:** 003-00315  
**Reviewer:** Chrystal Wagner  
**Date:** August 18, 2005

Total Rectifier Capacity  
Amps

800.0

|                                |              |
|--------------------------------|--------------|
| Emission Factor in grains/A-hr | PM*<br>0.069 |
| Potential Emission in tons/yr  | 0.03         |

\*Total PM includes filterable and condensable PM. All PM is likely to be emitted as PM10.

**Methodology**

Emission Factors are from AP 42, Chapter 12.20, Table 12.20-1.

Emission (tons/yr) = Capacity (amps) x Emission Factor (gr/A-hr) x 8760 hr/yr x lb/7000 gr x ton/2,000 lb

**Appendix A: Emissions Calculations  
Bright Nickel Electroplating**

**HAP: Nickel Emissions**

**Company Name:** Reckon Plating, Inc.  
**Address City IN Zip:** 5300 South Hanna Street, Fort Wayne, Indiana 46806  
**Permit Number:** MSOP 003-21544-00315  
**Pit ID:** 003-00315  
**Reviewer:** Chrystal Wagner  
**Date:** August 18, 2005

Total Rectifier Capacity  
Amps

1000.0

|                                |                |
|--------------------------------|----------------|
| Emission Factor in grains/A-hr | Nickel<br>0.63 |
| Potential Emission in tons/yr  | 0.39           |

**Methodology**

Emission Factors are from AP 42, Chapter 12.20, Table 12.20-4.

Emission (tons/yr) = Capacity (amps) x Emission Factor (gr/A-hr) x 8760 hr/yr x lb/7000 gr x ton/2,000 lb