



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 20, 2012

RE: SCP Limited, Inc. / 033-32010-00107

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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**Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**SCP Limited, Inc.
1700 S. Indiana Ave.
Auburn, Indiana 46706**

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

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.

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

Operation Permit No.: M033-32010-00107	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 20, 2012 Expiration Date: September 20, 2017

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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)]

The Permittee owns and operates a stationary igniter manufacturing facility.

Source Address:	1700 S. Indiana Ave., Auburn, Indiana 46706
General Source Phone Number:	(260) 925-2588
SIC Code:	3822 (Automatic Controls for Regulating Residential and Commercial Environments and Appliances)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), approved for construction in 2012, applying a maximum of 10.0 pounds of Nickel alloy wire per hour to metalize a maximum of 150 parts per hour, equipped with a Torit dust collector to control particulate emissions, and exhausting outside the building through stack V-11.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, electric arc thermal spraying booth EU-27 is considered an affected facility.

- (b) Billet Machining Operations, identified as EU-31, constructed in 2011, including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 20.0 pounds per hour, equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.
- (c) One (1) TRINCO Blast Cabinet, identified as EU-30, constructed in 2011, processing a maximum of one (1) cycle, 15 tiles (or 2.14 pounds of tiles), per 0.75 hours, equipped with an abrasive separator and filter bag to control particulate emissions, and exhausting inside the building.
- (d) Lamination Operations, identified as EU-32, constructed in 2011, processing a maximum of 25 assemblies per hour, and applying a maximum of 0.011 oz of adhesive per assembly using hand-held aerosol spray cans, equipped with a HEPA filter to control particulate emissions, and exhausting inside the building.
- (e) Solvent cleaning associated with the screen printing and lamination operations, using a maximum of 0.63 gal/hr, or 15 gal/day, of HAP-free solvent to hand-wipe clean the plates after use.

- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
- (1) One (1) natural gas-fired furnace for localized heating, identified as EU-1, constructed in 1995, with maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-1.
 - (2) One (1) natural gas-fired hot water heater, identified as EU-2, constructed in 1990, with maximum heat input capacity of 0.34 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-2.
 - (3) One (1) natural gas infrared space heating unit, identified as EU-7, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting through stack S-3.
 - (4) One (1) natural gas-fired furnace for localized heating, identified as EU-9, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through S-4.
 - (5) One (1) natural gas-fired furnace for localized heating, identified as EU-11, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-5.
 - (6) One (1) natural gas-fired life test chamber for pilot lights, identified as EU-12, constructed in 1990, with maximum heat input capacity of 0.04 MMBtu/hr, uncontrolled, and exhausting outside the building through S-6.
 - (7) One (1) natural gas-fired furnace for localized heating, identified as EU-13, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-7.
 - (8) One (1) natural gas-fired furnace for localized heating, identified as EU-14, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-8.
 - (9) One (1) natural gas-fired furnace for localized heating, identified as EU-16, constructed in 2011, with a maximum heat input capacity of 0.14 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-9.
 - (10) One (1) natural gas-fired pilot production tester, identified as EU-17, constructed in 1990, with a maximum throughput capacity of 136 parts per hour, and a maximum heat input capacity of 0.016 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-10.
 - (11) One (1) natural gas-fired pilot audit tester, identified as EU-18, constructed in 1990, with a maximum throughput capacity of 42 parts per hour, and a maximum heat input capacity of 0.006 MMBtu/hr, uncontrolled, and exhausting outside the building through vent V-8.
 - (12) One (1) natural gas-fired furnace for localized heating, identified as EU-19, constructed in 1990, with a maximum heat input capacity of 0.075 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-11.
 - (13) Two (2) natural gas-fired furnaces for localized heating, identified as EU-21 and 22, constructed in 1990, with a maximum heat input capacity of 0.105 MMBtu/hr, each, uncontrolled, and exhausting outside the building through stack S-12 and S-13.

- (14) One (1) natural gas-fired furnace for localized heating, identified as EU-28, constructed in 2011, with a maximum heat input capacity of 0.30 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-14.
- (15) One (1) natural gas-fired infrared space heating unit, identified as EU-29, constructed in 2007, with a maximum heat input capacity of 0.125 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-15.
- (g) Emission units not regulated by a NESHAP, with potential uncontrolled emissions that are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs; and for which the potential uncontrolled emissions of PM₁₀, NO_x, SO₂, VOCs, and CO are each equal to or less than one (1) pound per day; include:
 - (1) Four (4) resistance welders for fusion welding of mild and stainless steel, identified as EU-23 thru EU-26, constructed in 1990, uncontrolled, and exhausting outside the building through Vent V-10.
 - (2) Two (2) tweezer welders for attaching wires and braze leaf, identified as EU-34, constructed in 1990, uncontrolled, and exhausting inside the building
 - (3) One (1) laser machine for tile scribing, identified as EU-33, which does not produce fugitive emissions, is equipped with a dust collection device such as a bag filter, cyclone, or equivalent device, and exhausts inside the building.
 - (4) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.
 - (5) Mold making operations, consisting of hand-mixing and hand-pouring water-based plaster, that contains less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that is also HAP-free.
 - (6) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilo Pascals measured at thirty-eight (38) degrees Centigrade).
 - (7) One (1) billet slurry mixing and casting operation, using a proprietary blend of ingredients that contain less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that are also HAP-free. The ingredients are hand-loaded into a mixer unit, rolled until blended and hand-poured into molds.
 - (8) One (1) potting operation, identified as Potting, for the hand-mixing and hand-application of water-based ceramic adhesives containing less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that are also HAP-free.
 - (9) One (1) boron nitride spray coating operation, consisting of applying a maximum of 0.0049 gal of boron nitride based, HAP-free paint per part using hand-held aerosol spray cans.
 - (10) Screen Printing Operations, identified as EU-32, constructed in 2011, including silk screening a maximum of 50 parts per hour using a proprietary blend of inks that contain no VOCs or HAPs, equipped with a HEPA filter to control particulate emissions, and exhausting inside the building.
 - (11) Cleaning stamped metal terminals and laser scribed parts with acetone prior to assembly. This process, identified as EU-35, is uncontrolled and exhausts inside the building.

- (12) Infrared cure equipment.
- (13) Electrically powered processes, including:
 - (A) One (1) 30 ton, electrically powered, vacuum/hydraulic hot press, identified as EU-5, constructed in 2009, with a maximum throughput capacity of 15 parts per 12 hour cycle, uncontrolled, and exhausting outside the building through vent V-3.
 - (B) One (1) electrically powered vacuum furnace, identified as EU-6, constructed in 2011, uncontrolled, and exhausting outside the building through Vent V-4.
 - (C) One (1) high temperature electric (1200 °F) furnace used for binder burnout of ceramic material, identified as EU-15, constructed in 2011, uncontrolled and exhausting outside the building through Vent V-7.
 - (D) One (1) 50 hp Gardner-Denver electrically powered air compressor, identified as EU-10, constructed in 1990, uncontrolled, and exhausting outside the building through Vent V-6..
- (14) Manual loading and unloading operations.
- (15) Activities performed using hand-held equipment, including the following:
 - (A) Buffing.
 - (B) Cutting, excluding cutting torches.
 - (C) Drilling.
 - (D) Grinding.
 - (E) Machining wood, metal, or plastic.
 - (F) Polishing.
 - (G) Routing.
 - (H) Sanding.
 - (I) Sawing.
 - (J) Surface grinding.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M033-32010-00107, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M033-32010-00107 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (c) 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.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3)

linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such

that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports, and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date

it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), approved for construction in 2012, applying a maximum of 10.0 pounds of Nickel alloy wire per hour to metalize a maximum of 150 parts per hour, equipped with a Torit dust collector to control particulate emissions, and exhausting outside the building through stack V-11.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, electric arc thermal spraying booth EU-27 is considered an affected facility.

- (b) Billet Machining Operations, identified as EU-31, constructed in 2011, including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 20.0 pounds per hour, equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.
- (c) One (1) TRINCO Blast Cabinet, identified as EU-30, constructed in 2011, processing a maximum of one (1) cycle, 15 tiles (or 2.14 pounds of tiles), per 0.75 hours, equipped with an abrasive separator and filter bag to control particulate emissions, and exhausting inside the building.

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

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

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), since the process weight rate from each of the processes listed in the table below is less than one hundred (100) pounds per hour, the allowable particulate emission rate shall not exceed the corresponding pound per hour limitations, as follows:

Emission Unit	Process Weight Rate	Allowable Particulate Emission Rate
	(lbs/hr)	(lb/hour)
Electric Arc Thermal Spraying Booth	19.5	0.551
Billet Machining Operations	20.0	0.551

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

A Preventive Maintenance Plan is required for these facilities and their respective control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Particulate Control

- (a) In order to comply with Condition D.1.1, the Torit Dust Collector for particulate control shall be in operation and control emissions from the Electric Arc Thermal Spraying Booth at all times the Electric Arc Thermal Spraying Booth is in operation.
- (b) In order to comply with Condition D.1.1, the Torit Dust Collector for particulate control shall be in operation and control emissions from the Billet Machining Operations, including the

milling, cutting, and slicing activities, at all times the Billet Machining Operations, including the milling, cutting, and slicing activities, are in operation.

- (c) In order to comply with 326 IAC 2-6.1-5 (MSOP), the abrasive separator and filter bag for particulate control shall be in operation and control emissions from the TRINCO Blast Cabinet at all times the TRINCO Blast Cabinet is in operation.
- (d) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.4 Testing Requirements [326 IAC 2-6.1-5(a)(2)] [326 IAC 2-1.1-11]

Pursuant to Air-014-NPD and in order to verify compliance with 326 IAC 2-6.1-5, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)), and Condition D.1.1, the source shall perform a one-time performance test to verify the uncontrolled Nickel emission factor not later than 180 days after the initial startup of the Electric Arc Thermal Spraying Booth utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.5 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the Torit Dust Collector used in conjunction with the Electric Arc Thermal Spraying Booth, at least once per day when the Electric Arc Thermal Spraying Booth is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the Torit Dust Collector used in conjunction with the Billet Machining Operation, at least once per day when the Billet Machining is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (c) The Permittee shall record the pressure drop across the filter separator and dust collector used in conjunction with the TRINCO Blast Cabinet, at least once per day when the TRINCO Blast Cabinet is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response.

The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replace at least once every six (6) months.

D.1.6 Broken or Failed Bag Detection

- (a) For a single compartment dust collectors controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).
- (b) For a single compartment dust collectors controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line or emissions unit, as appropriate. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5(a), the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collector controlling the Electric Arc Thermal Spraying Booth. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.5(b), the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collector controlling the Billet Machining Operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.1.5(c), the Permittee shall maintain daily records of the pressure drop across the filter separator and dust collector controlling the TRINCO Blast Cabinet. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

NESHAP REQUIREMENTS

Emissions Unit Description: Electric Arc Thermal Spraying Booth

- (a) One (1) Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), approved for construction in 2012, applying a maximum of 10.0 pounds of Nickel alloy wire per hour to metalize a maximum of 150 parts per hour, equipped with a Torit dust collector to control particulate emissions, and exhausting outside the building through stack V-11.

Under 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, electric arc thermal spraying booth EU-27 is considered an affected facility.

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

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 1 of 40 CFR Part 63, Subpart WWWWWW in accordance with schedule in 40 CFR 63 Subpart WWWWWW.

- (b) Pursuant to 40 CFR 63.12, the Permittee shall submit all required notifications and reports to:

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

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAPs): Area Source Standards for Plating and Polishing Operations [40 CFR 63, Subpart WWWWWW]

The Permittee, that owns or operates a plating and polishing facility, as defined in 40 CFR 63.11504, that is an area source of plating and polishing metal hazardous air pollutant (HAP) emissions, as defined in 40 CFR 63.11511, shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWWW (included as Attachment A of this permit), with a compliance date of July 1, 2010:

- (a) 40 CFR 63.11504(a)(1)(iii) & (iv),(2),(3)
- (b) 40 CFR 63.11505(a)(2),(3), (c), (d), (e)
- (c) 40 CFR 63.11506(c)
- (d) 40 CFR 63.11507(e), (f), (g),
- (e) 40 CFR 63.11508(a), (b), (c)(8),(10),(11), (d)(1),(2),(4)
- (f) 40 CFR 63.11509(a)(1),(2),(4), (b)(1),(2), (c)(2)(ii),(iii),(7), (d), (e), (f)
- (g) 40 CFR 63.11510
- (h) 40 CFR 63.11511
- (i) 40 CFR 63.11512
- (j) Table 1

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	SCP Limited, Inc.
Address:	1700 S. Indiana Ave.
City:	Auburn, Indiana 46706
Phone #:	(260) 925-2588
MSOP #:	M033-32010-00107

I hereby certify that SCP Limited, Inc. is :

still in operation.

no longer in operation.

I hereby certify that SCP Limited, Inc. is :

in compliance with the requirements of MSOP M033-32010-00107.

not in compliance with the requirements of MSOP M033-32010-00107.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Minor Source Operating Permit (MSOP)
OFFICE OF AIR QUALITY**

**SCP Limited, Inc.
1700 S. Indiana Ave.,
Auburn, IN 46706**

Attachment A

Title 40: Protection of Environment

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

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

M033-32010-00107

40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

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

Applicability and Compliance Dates

§ 63.11504 Am I subject to this subpart?

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

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

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

(ii) Electroless or non-electrolytic plating.

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

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

(v) Electroforming.

(vi) Electropolishing.

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

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

(b) [Reserved]

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

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

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

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

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

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

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

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

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

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

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

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

(4) Plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment.

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

(6) Any plating or polishing process that uses process materials that contain cadmium, chromium, lead, or nickel (as the metal) in amounts less than 0.1 percent by weight, or that contain manganese in amounts less than 1.0 percent by weight (as the metal), as used. Information used to determine the amount of plating and polishing metal HAP in materials used in the plating or polishing process may include information reported on the Material Safety Data Sheet for the material, but is not required. For plating or polishing tanks, the HAP content may be determined from the final bath contents "as used" to plate or to polish.

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

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

§ 63.11506 What are my compliance dates?

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

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

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

Standards and Compliance Requirements

§ 63.11507 What are my standards and management practices?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(c) If you own or operate an affected new or existing process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that does not meet the definition of short-term or flash electroplating) and contains one or more of the plating and polishing metal HAP, you must meet the requirements specified in paragraph (a) or (b) of this section, whichever apply to the process operation, and implement the applicable management practices in paragraph (g) of this section, as practicable.

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

(1) You must measure and record the pH of the bath upon startup of the bath, as defined in §63.11511, "What definitions apply to this subpart?" No additional pH measurements are required.

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

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

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

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

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

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

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

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

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

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

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

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

- (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (4) Use tank covers, if already owned and available at the facility, whenever practicable.
- (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (10) Minimize spills and overflow of tanks, as practicable.
- (11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

§ 63.11508 What are my compliance requirements?

- (a) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with §63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"
- (b) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times.
- (c) To demonstrate initial compliance, you must satisfy the requirements specified in paragraphs (c)(1) through (11) of this section.
 - (1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(1)(i) through (iv) of this section.
 - (i) You must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.

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

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

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

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

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

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

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

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

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

(3) If you own or operate an affected batch electrolytic process tank, as defined in §63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in §63.11507(a), "What are my standards and management practices?" and you use a tank cover, as defined in §63.11511, to comply with §11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(3)(i) through (iv) of this section.

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

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

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

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

(4) If you own or operate an affected continuous electrolytic process tank, as defined in §63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?" and you cover the tank surface to comply with §11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(4)(i) through (iv) of this section.

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

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

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

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

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must demonstrate initial compliance according to paragraphs (c)(5)(i) through (iii) of this section.

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

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

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

(6) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate initial compliance according to paragraphs (c)(6)(i) through (iv) of this section.

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

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

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

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

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

(i) You must report in your Notification of Compliance Status the pH of the bath solution that was measured at startup, as defined in §63.11511, according to the requirements of §63.11507(d)(1).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by limiting the plating time for the affected tank, you must demonstrate continuous compliance according to paragraphs (d)(5)(i) through (iii) of this section.

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

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

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

(6) If you own or operate an affected batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of §63.11507(a), "What are my standards and management practices?" or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and you comply with §11507(a), (b) or (c) of this section by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(6)(i) through (iii) of this section.

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

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

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

(7) If you own or operate an affected continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), "What are my standards and management practices?" and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(7)(i) and (ii) of this section.

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

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

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

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

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

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

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

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

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

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

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

(4) If you startup your new affected source after July 1, 2008, you must submit an Initial Notification when you become subject to this subpart.

(b) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with paragraphs (b)(1) through (3) of this section.

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

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

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

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

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

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

(3) If a facility makes a change to any items in (b)(2)(i), iii, and (iv) of this section that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change.

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

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

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

- (i) Electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a), “What are my standards and management practices?”, and you use a control system to comply with this subpart;
 - (ii) Dry mechanical polishing operation that is subject to §63.11507(e); or
 - (iii) Permanent thermal spraying operation that is subject to §63.11507(f)(1) or (2).
- (3) If you own or operate an affected flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), “What are my standards and management practices?” and you comply with §11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
- (4) If you own or operate an affected batch electrolytic process tank that is subject to the requirements of §63.11507(a) or a flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), “What are my standards and management practices?” and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.
- (5) If you own or operate an affected continuous electrolytic process tank that is subject to the requirements of §63.11507(a), “What are my standards and management practices?” and you comply with §11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have covered at least 75 percent of the surface area of the tank during all periods of electrolytic process operation.
- (6) If you own or operate an affected tank or other affected plating and polishing operation that is subject to the management practices specified in §63.11507(g), “What are my standards and management practices?” you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.
- (7) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.
- (d) If you own or operate an affected source, and any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority.
- (e) You must keep the records specified in paragraphs (e)(1) through (3) of this section.
- (1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.
 - (2) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part.
 - (3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in §63.11508(d), “What are my compliance requirements?”
- (f) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years.

Other Requirements and Information

§ 63.11510 What General Provisions apply to this subpart?

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

§ 63.11511 What definitions apply to this subpart?

Terms used in this subpart are defined in this section.

Batch electrolytic process tank means a tank used for an electrolytic process in which a part or group of parts, typically mounted on racks or placed in barrels, is placed in the tank and immersed in an electrolytic process solution as a single unit (i.e., as a batch) for a predetermined period of time, during which none of the parts are removed from the tank and no other parts are added to the tank, and after which the part or parts are removed from the tank as a unit.

Bath means the liquid contents of a tank, as defined in this section, which is used for electroplating, electroforming, electropolishing, or other metal coating processes at a plating and polishing facility.

Bench-scale means any operation that is small enough to be performed on a bench, table, or similar structure so that the equipment is not directly contacting the floor.

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

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

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

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

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

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

Conversion coatings are coatings that form a hard metal finish on an object when the object is submerged in a tank bath or solution that contains the conversion coatings. Conversion coatings for the purposes of this rule

include coatings composed of chromium, as well as the other plating and polishing metal HAP, where no electrical current is used.

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

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

- (1) Fails to meet any requirement or obligation established by this rule including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this rule and that is included in the operating permit for any affected facility required to obtain such a permit; or
- (3) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this rule during startup, shutdown, or malfunction.

Dry mechanical polishing means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating or thermal spraying with any of the plating and polishing metal HAP, as defined in this section, using automatic or manually-operated machines that have hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles. The affected process does not include polishing with use of pastes, liquids, lubricants, or any other added materials.

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

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

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

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

Electropolishing means an electrolytic process performed in a tank after plating that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing. For the purposes of this subpart, electropolishing does not include bench-scale operations.

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

Filters, for the purposes of this part, include cartridge, fabric, or HEPA filters, as defined in this section.

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

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

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

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

Maintenance is any process at a plating and polishing facility that is performed to keep the process equipment or the facility operating properly and is not performed on items to be sold as products.

Major facility for HAP is any facility that emits greater than 10 tpy of any HAP, or that emits a combined total of all HAP of over 25 tpy, where the HAP used to determine the total facility emissions are not restricted to only plating and polishing metal HAP or from only plating and polishing operations.

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

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

Metal HAP content of material used in plating and polishing is the HAP content as determined from an analysis or engineering estimate of the HAP contents of the tank bath or solution, in the case of plating, metal coating, or electropolishing; or the HAP content of the metal coating being applied in the case of thermal spraying. Safety data sheet (SDS) information may be used in lieu of testing or engineering estimates but is not required to be used.

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

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

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

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

Plating and polishing facility means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP, as defined in this section: electroplating processes other than chromium electroplating (*i.e.*, non-chromium electroplating); electroless plating; other non-electrolytic metal coating processes performed in a tank, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating or thermal spraying. Plating is performed in a tank or thermally sprayed so that a metal coating is irreversibly applied to an object. Plating and polishing does not include any bench-scale processes.

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

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

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

Repair means any process used to return a finished object or tool back to its original function or shape.

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

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

Startup of the tank bath is when the components or relative proportions of the various components in the bath have been altered from the most recent operating period. Startup of the bath does not include events where only

the tank's heating or agitation and other mechanical operations are turned back on after being turned off for a period of time.

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

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

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

Thermal spraying (also referred to as metal spraying or flame spraying) is a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a metallic coating is applied by projecting heated, molten, or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying. This operation does not include spray painting at ambient temperatures.

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

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

[73 FR 37741, July 1, 2008, as amended at 76 FR 57921, Sept. 19, 2011]

§ 63.11512 Who implements and enforces this subpart?

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

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

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

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

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

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

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

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

§ 63.11513 [Reserved]

Table 1 to Subpart WWWWWW of Part 63—Applicability of General Provisions to Plating and Polishing Area Sources

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

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

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

[73 FR 37741, July 1, 2008, as amended at 76 FR 57922, Sept. 19, 2011]

Additional Information

US EPA Plating and Polishing Area Source Brochure, weblink: <http://www.epa.gov/ttn/atw/area/platpolb.pdf>

Reference

The US EPA Electronic Code of Federal Regulations - 40 CFR 63, Subpart WWWWWW: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations web address:

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=e9a08c3e4308b9d8938e9529efbc6b50&rgn=div6&view=text&node=40:14.0.1.1.1.32&idno=40>

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)
Transitioning to a Minor Source Operating Permit (MSOP)

Source Description and Location
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Source Name:	SCP Limited, Inc.
Source Location:	1700 S. Indiana Ave., Auburn, IN 46706
County:	DeKalb
SIC Code:	3822 (Automatic Controls for Regulating Residential and Commercial Environments and Appliances)
Operation Permit No.:	M033-32010-00107
Permit Reviewer:	Hannah L. Desrosiers

On June 13, 2012, the Office of Air Quality (OAQ) received an application from SCP Limited, Inc. related to the transition of a FESOP to a MSOP.

The requested transition was accomplished as follows:

The potential to emit (PTE) particulates (PM/PM10/PM2.5) from the TRINCO Blast Cabinet, identified as EU-30, was initially determined using the abrasive separator and filter bag specifications, including the outlet grain loading, design air flow rate, and control efficiency. This method vastly over estimated the PTE for this unit.

Since issuance of FESOP NSR No.: F033-30963-00107, SCP Limited, Inc. has conducted an in-house mass balance study to develop a source specific emission factor for the operation using guidance and direction provided by IDEM.

Note: The term "mass balance" can very simply be defined as, "what goes in must come out". Therefore, the mass of inputs to a process balances the mass of outputs as products, emissions, and wastes. To form a conservative estimate, it is generally assumed that all of the material removed to form the product, including the emissions and wastes, becomes particulate emissions (i.e., PM/PM10/PM2.5). This method, while conservative, provides a more realistic view of the PTE from the operation than using the control device specifications.

Upon completion of the mass balance study, SCP submitted appropriate documentation to IDEM for review. IDEM has reviewed the methodology and results, and determined that the source specific emission factor be approved for estimating Particulate Matter (PM/PM10/PM2.5) emissions from the shot blast cabinet. Therefore, the emissions calculations have been updated to incorporate the new emission factor for the TRINCO Blast Cabinet, as documented in Appendix A of this TSD, and the transition is supported.

Finally, the emission unit description for this unit has been updated to reflect the throughput capacity documented by the mass balance study.

Existing Approvals

The source has been operating under FESOP NSR No. F033-30963-00107, issued on January 24, 2012.

Due to this application, the source is transitioning from a FESOP to a MSOP.

County Attainment Status

The source is located in DeKalb County. The following attainment status designations are applicable to DeKalb County:

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) Ozone Standards
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM_{2.5}
 DeKalb County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Other Criteria Pollutants
 DeKalb County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by SCP Limited, Inc. on June 13, 2012, relating to a transition from their Federally Enforceable State Operating Permit (FESOP), issued on January 24, 2012, to a Minor Source Operating Permit (MSOP).

The source consists of the following permitted emission units:

- (a) One (1) Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), approved for construction in 2012, applying a maximum of 10.0 pounds of Nickel alloy wire per hour to metalize a maximum of 150 parts per hour, equipped with a Torit dust collector to control particulate emissions, and exhausting outside the building through stack V-11.

Under 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, electric arc thermal spraying booth EU-27 is considered an affected facility.

- (b) One (1) TRINCO Blast Cabinet, identified as EU-30, constructed in 2011, processing a maximum of one (1) cycle, 15 tiles (or 2.14 pounds of tiles), per 0.75 hours, equipped with an abrasive separator and filter bag to control particulate emissions, and exhausting inside the building.
- (c) Billet Machining Operations, identified as EU-31, constructed in 2011, including milling, cutting, and slicing activities for the shaping of billets, having a maximum process weight rate of 20.0 pounds per hour, equipped with a Torit Dust Collector to control particulate emissions, and exhausting inside the building.
- (d) Lamination Operations, identified as EU-32, constructed in 2011, processing a maximum of 25 assemblies per hour, and applying a maximum of 0.011 oz of adhesive per assembly using hand-held aerosol spray cans, equipped with a HEPA filter to control particulate emissions, and exhausting inside the building.
- (e) Solvent cleaning associated with the screen printing and lamination operations, using a maximum of 0.63 gal/hr, or 15 gal/day, of HAP-free solvent to hand-wipe clean the plates after use.
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) One (1) natural gas-fired furnace for localized heating, identified as EU-1, constructed in 1995, with maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-1.
 - (2) One (1) natural gas-fired hot water heater, identified as EU-2, constructed in 1990, with maximum heat input capacity of 0.34 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-2.
 - (3) One (1) natural gas infrared space heating unit, identified as EU-7, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting through stack S-3.
 - (4) One (1) natural gas-fired furnace for localized heating, identified as EU-9, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through S-4.
 - (5) One (1) natural gas-fired furnace for localized heating, identified as EU-11, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-5.
 - (6) One (1) natural gas-fired life test chamber for pilot lights, identified as EU-12, constructed in 1990, with maximum heat input capacity of 0.04 MMBtu/hr, uncontrolled, and exhausting outside the building through S-6.

- (7) One (1) natural gas-fired furnace for localized heating, identified as EU-13, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-7.
 - (8) One (1) natural gas-fired furnace for localized heating, identified as EU-14, constructed in 1990, with a maximum heat input capacity of 0.10 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-8.
 - (9) One (1) natural gas-fired furnace for localized heating, identified as EU-16, constructed in 2011, with a maximum heat input capacity of 0.14 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-9.
 - (10) One (1) natural gas-fired pilot production tester, identified as EU-17, constructed in 1990, with a maximum throughput capacity of 136 parts per hour, and a maximum heat input capacity of 0.016 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-10.
 - (11) One (1) natural gas-fired pilot audit tester, identified as EU-18, constructed in 1990, with a maximum throughput capacity of 42 parts per hour, and a maximum heat input capacity of 0.006 MMBtu/hr, uncontrolled, and exhausting outside the building through vent V-8.
 - (12) One (1) natural gas-fired furnace for localized heating, identified as EU-19, constructed in 1990, with a maximum heat input capacity of 0.075 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-11.
 - (13) Two (2) natural gas-fired furnaces for localized heating, identified as EU-21 and 22, constructed in 1990, with a maximum heat input capacity of 0.105 MMBtu/hr, each, uncontrolled, and exhausting outside the building through stack S-12 and S-13.
 - (14) One (1) natural gas-fired furnace for localized heating, identified as EU-28, constructed in 2011, with a maximum heat input capacity of 0.30 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-14.
 - (15) One (1) natural gas-fired infrared space heating unit, identified as EU-29, constructed in 2007, with a maximum heat input capacity of 0.125 MMBtu/hr, uncontrolled, and exhausting outside the building through stack S-15.
- (g) Emission units not regulated by a NESHAP, with potential uncontrolled emissions that are equal to or less than one (1) pound per day on an emission unit basis for any single HAP or combination of HAPs; and for which the potential uncontrolled emissions of PM10, NOx, SO2, VOCs, and CO are each equal to or less than one (1) pound per day; include:
- (1) Four (4) resistance welders for fusion welding of mild and stainless steel, identified as EU-23 thru EU-26, constructed in 1990, uncontrolled, and exhausting outside the building through Vent V-10.
 - (2) Two (2) tweezer welders for attaching wires and braze leaf, identified as EU-34, constructed in 1990, uncontrolled, and exhausting inside the building
 - (3) One (1) laser machine for tile scribing, identified as EU-33, which does not produce fugitive emissions, is equipped with a dust collection device such as a bag filter, cyclone, or equivalent device, and exhausts inside the building.
 - (4) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

- (5) Mold making operations, consisting of hand-mixing and hand-pouring water-based plaster, that contains less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that is also HAP-free.
- (6) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilo Pascals measured at thirty-eight (38) degrees Centigrade).
- (7) One (1) billet slurry mixing and casting operation, using a proprietary blend of ingredients that contain less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that are also HAP-free. The ingredients are hand-loaded into a mixer unit, rolled until blended and hand-poured into molds.
- (8) One (1) potting operation, identified as Potting, for the hand-mixing and hand-application of water-based ceramic adhesives containing less than or equal to five percent (5%) by volume of VOCs, excluding HAPs, and that are also HAP-free.
- (9) One (1) boron nitride spray coating operation, consisting of applying a maximum of 0.0049 gal of boron nitride based, HAP-free paint per part using hand-held aerosol spray cans.
- (10) Screen Printing Operations, identified as EU-32, constructed in 2011, including silk screening a maximum of 50 parts per hour using a proprietary blend of inks that contain no VOCs or HAPs, equipped with a HEPA filter to control particulate emissions, and exhausting inside the building.
- (11) Cleaning stamped metal terminals and laser scribed parts with acetone prior to assembly. This process, identified as EU-35, is uncontrolled and exhausts inside the building.
- (12) Infrared cure equipment.
- (13) Electrically powered processes, including:
 - (A) One (1) 30 ton, electrically powered, vacuum/hydraulic hot press, identified as EU-5, constructed in 2009, with a maximum throughput capacity of 15 parts per 12 hour cycle, uncontrolled, and exhausting outside the building through vent V-3.
 - (B) One (1) electrically powered vacuum furnace, identified as EU-6, constructed in 2011, uncontrolled, and exhausting outside the building through Vent V-4.
 - (C) One (1) high temperature electric (1200 °F) furnace used for binder burnout of ceramic material, identified as EU-15, constructed in 2011, uncontrolled and exhausting outside the building through Vent V-7.
 - (D) One (1) 50 hp Gardner-Denver electrically powered air compressor, identified as EU-10, constructed in 1990, uncontrolled, and exhausting outside the building through Vent V-6..
- (14) Manual loading and unloading operations.
- (15) Activities performed using hand-held equipment, including the following:

- | | | | |
|-----|-------------------------------------|-----|-------------------|
| (A) | Buffing. | (F) | Polishing. |
| (B) | Cutting, excluding cutting torches. | (G) | Routing. |
| (C) | Drilling. | (H) | Sanding. |
| (D) | Grinding. | (I) | Sawing. |
| (E) | Machining wood, metal, or plastic. | (J) | Surface grinding. |
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.

Unpermitted Emission Units and Pollution Control Equipment

No unpermitted emission units were discovered operating at this existing source during this review process.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations. Also, the following applies:

- (a) During the review for FESOP NSR No. F033-30963-00107, issued on January 24, 2012, IDEM approved the use of the California Air Resources Board (CARB) emission factors (California Code of Regulations, Title 17, Section 93101.5, "Airborne Toxic Control Measure to Reduce Emissions of Hexavalent Chromium and Nickel from Thermal Spraying", Appendix 1 – Emission Calculation Method, pgs 21-30 of 35) to estimate particulate matter (PM/PM10/PM2.5) and Hazardous Air Pollutant (HAP) emissions from the electric arc thermal spraying booth.

IDEM has determined that testing is required to confirm the validity of the Nickel emission factor to the electric arc thermal spraying process at SCP Limited, Inc., because without a valid test, IDEM does not have adequate information to conclude that the Electric Arc Thermal Spraying Booth, identified as EU-27, actually operates in compliance with 326 IAC 2-6.1 (MSOP), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)). Additionally, IDEM will require the control device to be operated at all times the emission unit is in operation, and will require that the source perform monitoring of the control device in order to ensure that the device is in proper working order.

- (b) During the review for FESOP NSR No. F033-30963-00107, issued on January 24, 2012, IDEM approved the use of a source specific emission factor for estimating particulate matter (PM/PM10/PM2.5) emissions from the billet machining operation, identified as EU-31.

IDEM has determined that testing is not required to confirm the validity of this source specific emission factor. However, IDEM will require the source to operate the control device at all times the emission unit is in operation, and will require that the source perform monitoring of the control device in order to ensure that the device is in proper working order, to ensure compliance with 326 IAC 2-6.1, and 326 IAC 6-3.

- (c) As a part of this review, IDEM has approved the use of a source specific emission factor, developed from an in-house mass balance study (see the "Source Description and Location" section of this TSD, above, for more detail), to estimate particulate matter (PM/PM10/PM2.5) emissions from the TRINCO Blast Cabinet, identified as EU-30, as documented in Appendix A of this TSD.

IDEM has determined that testing will not be required to confirm the validity of this source specific emission factor. However, IDEM will require the source to operate the control device at all times the emission unit is in operation, and will require that the source perform monitoring of the control device in order to ensure that the device is in proper working order, to ensure compliance with 326 IAC 2-6.1.

- (d) Emissions from the miscellaneous activities category, which includes resistance welding, laser scribing, silk screening, hand mixing, mold making, casting, billet slurry mixing and casting, potting, binder burnout, manual loading and unloading operations, activities performed using hand-held equipment, and paved and unpaved parking lots, meet the definition of an insignificant or trivial activity, as defined in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). A conservative estimate has been formed based on confidential information submitted by the source. The potential to emit any single HAP is estimated at less than 2.50 tons/yr and the potential to emit any combination of HAPs is estimated at less than 2.50 tons/yr.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	65.47
PM10 ⁽¹⁾	65.51
PM2.5	65.51
SO ₂	0.005
NO _x	0.81
VOC	23.10
CO	0.68
GHGs as CO ₂ e	979.34
Total HAPs ⁽²⁾	2.77
"Worst" Single HAP ⁽²⁾	< 2.50 (any)

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

(2) A conservative estimate of emissions from the Miscellaneous Activities was formed based on confidential information submitted by the source. See the "Emission Calculations" Section above for more detail.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM10 and PM2.5, each, (including fugitive and non-fugitive emissions) are less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Electric Arc Thermal Spraying	15.33	15.33	15.33	0	0	0	0	0	0.25	0.25 (nickel)
Billet Machining	39.51	39.51	39.51	0	0	0	0	0	0	NA
Abrasive Blasting	0.58	0.58	0.58	0	0	0	0	0	0	NA
Lamination Operations	0.03	0.03	0.03	0	0	0.01	0	0	2.41E ⁻⁰³	2.41E ⁻⁰³ (hexane)
Solvent Cleaning	0	0	0	0	0	17.96	0	0	0	NA
Boron Nitride Coating	7.87E ⁻⁰⁴	7.87E ⁻⁰⁴	7.87E ⁻⁰⁴	0	0	0.09	0	0	0	NA
Natural Gas Combustion	0.02	0.06	0.06	0.005	0.81	0.04	0.68	979.34	0.02	0.015 (hexane)
Miscellaneous Activities ^α	10.00	10.00	10.00	0	0	5.00	0	0	< 2.50	< 2.50 (any)
Total PTE of Entire Source	65.47	65.51	65.51	0.005	0.81	23.10	0.68	979.34	2.77	< 2.50 (any)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible NA = not applicable * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The 100,000 CO2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. α A conservative estimate of emissions from the Miscellaneous Activities has been formed based on confidential information submitted by the source. The potential to emit any single HAP is estimated at less than 2.50 tons/yr and the potential to emit any combination of HAPs is estimated at less than 2.50 tons/yr.										

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) 40 CFR 63, Subpart T - NESHAPs for Halogenated Solvent Cleaning
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit because this source does not use a cold solvent cleaning machine or any degreasing solvent that contains any of the halogenated compounds listed in §63.460(a).
- (b) 40 CFR 63 Subpart MMMM - NESHAPs for Miscellaneous Metal Parts and Products Surface Coating
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (4M) (326 IAC 20-80), are not included in the permit because although coatings containing hazardous air pollutants (HAP) are applied to miscellaneous metal parts and products, as defined in §63.3881(a), this source is not a major source of HAPs. The potential of emit of any single HAP is less than ten (10) tons per year and any combination of HAPs is less than twenty-five (25) tons per year.
- (c) 40 CFR 63, Subpart DDDDD - NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (5D) (326 IAC 20-95), are not included in the permit, since this source is not a major source of HAPs, and is not located at nor is a part of a major source of HAP emissions.
- (d) 40 CFR 63, Subpart KKKKK - NESHAPs for Clay Ceramics Manufacturing
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Clay Ceramics Manufacturing, 40 CFR 63, Subpart KKKKK (5K) (326 IAC 20-73), are not included in the permit, since this source is not a major source of HAPs, and does not meet the definition of a clay ceramics manufacturing facility, as defined in §63.8535(a) and §63.8665.
- (e) 40 CFR 63, Subpart QQQQQ - NESHAPs for Friction Materials Manufacturing Facilities
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Friction Materials Manufacturing Facilities, 40 CFR 63, Subpart QQQQQ (5Q) (326 IAC 20-68), are not included in the permit, since this source is not a major source of HAPs, and does not meet the definition of a friction materials manufacturing facility, as defined in §63.9565.
- (f) 40 CFR 63, Subpart HHHHHH - NESHAP Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
- (1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H), are not included in the permit, for the Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth), since although this source meets the definition of an area source, as defined in 40 CFR 63.2, uses spray application methods to apply coatings containing compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and/or nickel (Ni), or cadmium (Cd), chromium (Cr), manganese (Mn), and/or nickel (Ni) in the elemental form, thermal spray operations (also known as metalizing, flame spray, plasma arc spray, and electric arc spray, among other names) are specifically exempted under §63.11180.
 - (2) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H), are not included in the permit, for the Boron Nitride Coating Operation and the Lamination Operations, since although this source meets the definition of an area source, as defined in 40 CFR 63.2, and uses spray application methods, they do not coat any part or product made of metal or plastic, or combinations of metal and plastic, and the coatings used in these operations do not contain compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and/or nickel (Ni), or cadmium (Cd), chromium (Cr), manganese (Mn), and/or nickel (Ni) in the elemental form.

- (3) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H), are not included in the permit, since the source does not perform any paint stripping using Methylene Chloride (MeCl) for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates, and/or perform spray application of coatings, as defined in §63.11180, to motor vehicles and/or mobile equipment.
- (g) 40 CFR 63, Subpart JJJJJJ - NESHAPs for Industrial, Commercial, and Institutional Boilers Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for the natural gas-fired hot water heater (EU-2), although this source meets the definition of an area source, as defined in 40 CFR 63.2, hot water heaters, as defined in §63.11237, are specifically exempted from this rule as indicated in §63.11195(f).
- (h) 40 CFR 63, Subpart RRRRRR - NESHAPs for Clay Ceramics Manufacturing Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Clay Ceramics Manufacturing Area Sources, 40 CFR 63, Subpart RRRRRR (6R), are not included in the permit, since although this source meets the definition of an area source, as defined in 40 CFR 63.2, it does not meet the definition of a clay ceramics manufacturing facility, as defined in §63.11444.
- (i) 40 CFR 63, Subpart WWWWWW - NESHAPs: Area Source Standards for Plating and Polishing Operations
This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Area Source Standards for Plating and Polishing Operations (40 CFR 63, Subpart WWWWWW (6W)), since it meets the definition of an area source, as defined in 40 CFR 63.2, and uses thermal spraying, as defined in §63.11511 and specifically listed in § 63.11504(a)(1)(iii), application methods to apply coatings containing compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and/or nickel (Ni), or cadmium (Cd), chromium (Cr), manganese (Mn), and/or nickel (Ni) in the elemental form.

The unit subject to this rule includes the following:

- Electric Arc Thermal Spraying Booth, identified as EU-27 (aka Flame Spray Booth)

Applicable portions of the NESHAP are the following:

- | | | | |
|-----|--|-----|-----------------|
| (a) | 40 CFR 63.11504(a)(1)(iii) & (iv),(2),(3) | (g) | 40 CFR 63.11510 |
| (b) | 40 CFR 63.11505(a)(2),(3), (c), (d), (e) | (h) | 40 CFR 63.11511 |
| (c) | 40 CFR 63.11506(c) | (i) | 40 CFR 63.11512 |
| (d) | 40 CFR 63.11507(e), (f), (g), | (j) | Table 1 |
| (e) | 40 CFR 63.11508(a), (b), (c)(8),(10),(11), (d)(1),(2),(4) | | |
| (f) | 40 CFR 63.11509(a)(1),(2),(4), (b)(1),(2), (c)(2)(ii),(iii),(7), (d), (e), (f) | | |

Note: There are no testing requirements applicable to this source for this NESHAP.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the Electric Arc Thermal Spraying Booth, identified as EU-27, except as otherwise specified in 40 CFR 63, Subpart WWWWWW.

- (j) 40 CFR 63, Subpart XXXXXX - NESHAPs: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (6X), are not included in the permit, since although this source meets the definition of an area source, as defined in 40 CFR 63.2, this source is not primarily engaged in the operations listed in one of the nine metal fabrication and finishing source categories, as defined in §63.11514 and §63.11522.
- (k) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 1-7 (Stack Height)
The potential to emit PM, PM10, and PM2.5, from the Billet Machining Operation, are greater than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 1-7 apply and are included in Section C, of the permit. The source shall comply according to the provisions of 326 IAC 1-7-3.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability Determination – Individual Facilities

Electric Arc Thermal Spraying

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))
A control device is required to limit particulate emissions (PM/PM10/PM2.5) from the electric arc thermal spraying operation, for compliance with 326 IAC 2-6.1-5 (MSOP) and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). Therefore a PMP is required for this unit and its associated control device.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the Electric Arc Thermal Spraying Booth, since it has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant 326 IAC 6-3-2(e)(2), since the process weight rate is less than one hundred (100) pounds per hour, the allowable particulate emission rate is five hundred fifty-one thousandths (0.551) pound per hour.

Note: The electric arc thermal spraying does not meet the definition of a surface coating, as defined in 326 IAC 6-3-1.5, since the coating being applied does not consist of a solvent or waterbased coating, but is molten metal.

Note: Pursuant to 326 IAC 6-3-2(e)(1), the allowable rate of emission shall be based on the process weight rate (PWR) for a manufacturing process. The "Process weight; weight rate" is defined under 326 IAC 1-2-59 as the total weight of all materials introduced into any source operation. The process weight rate for the Electric Arc Thermal Spraying Booth equals the weight of wire plus the weight of the parts, and is 19.5 lbs/hr, which is less than one hundred (100) pounds per hour.

Based on the calculations in Appendix A, the potential uncontrolled PM emission rate from the electric arc thermal spraying booth is 3.50 pounds per hour, therefore, the Torit Dust Collector, for particulate control, shall be in operation and control emissions at all times that electric arc thermal spraying booth is in operation, in order to comply with this limit.

See Appendix A, for the detailed calculations.

- (c) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited potential to emit VOC from the Electric Arc Thermal Spraying operation is less than twenty-five (25) tons per year, since the materials used do not contain any VOCs; therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.

- (d) 326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations)
The source coats ceramic based parts, not metal or plastic, using thermal spraying techniques where nickel based wire is melted and sprayed onto the part. Additionally, the unlimited potential to emit VOC from the operation is less than 15 pounds per day, since the materials used do not contain any VOCs; therefore, the requirements of 326 IAC 8-2-9 do not apply, and are not included in the permit.
- (e) There are no other 326 IAC 8 Rules that are applicable to the Electric Arc Thermal Spraying Booth.

Billet Machining & Abrasive Blasting

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan (PMP))
- (1) A control device is required to limit particulate emissions (PM/PM10/PM2.5) from the Billet Machining Operations, for compliance with 326 IAC 2-6.1-5 (MSOP) and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). Therefore a PMP is required for these units and their associated control devices.
- (2) A control device is required to limit particulate emissions (PM/PM10/PM2.5) from the TRINCO Blast Cabinet, for compliance with 326 IAC 2-6.1-5 (MSOP). Therefore a PMP is required for these units and their associated control devices.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the Electric Arc Thermal Spraying Booth, since it has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant 326 IAC 6-3-2(e)(2), since the process weight rate is less than one hundred (100) pounds per hour, the allowable particulate emission rate is five hundred fifty-one thousandths (0.551) pound per hour.

Note: Pursuant to 326 IAC 6-3-2(e)(1), the allowable rate of emission shall be based on the process weight rate (PWR) for a manufacturing process. The "Process weight; weight rate" is defined under 326 IAC 1-2-59 as the total weight of all materials introduced into any source operation. The process weight rate for the Billet Machining Operations equals the weight of the parts being machined, and is 20.0 lbs/hr, which is less than one hundred (100) pounds per hour.

Based on the calculations in Appendix A, the potential uncontrolled PM emission rate from the Billet Machining Operations is 9.02 pounds per hour, therefore, the Torit Dust Collector, for particulate control, shall be in operation and control emissions at all times that Billet Machining Operations is in operation, in order to comply with this limit.

- (2) The TRINCO Blast Cabinet has potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) the TRINCO Blast Cabinet is exempt from 326 IAC 6-3, and the requirements are not included in the permit.

See Appendix A, for the detailed calculations.

Lamination Operation & Boron Nitride Coating

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) The adhesive coating performed in the lamination operation is used to apply less than five (5) gallons of coating per day. Therefore, pursuant to 326 IAC 6-3-1(b)(15), this unit is exempt from 326 IAC 6-3, and the requirements are not included in the permit.
- (2) The boron nitride coating operation is used to apply less than five (5) gallons of coating per day. Therefore, pursuant to 326 IAC 6-3-1(b)(15), this unit is exempt from 326 IAC 6-3, and the requirements are not included in the permit.

- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
- (1) The unlimited potential to emit VOC from the lamination operation is less than twenty-five (25) tons per year; therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.
- (2) The unlimited potential to emit VOC from the boron nitride coating operation is less than twenty-five (25) tons per year; therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.
- (c) 326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations)
The parts being coated in the lamination and boron nitride coating operations are comprised of ceramics, and not metal or plastic. Therefore, the requirements of 326 IAC 8-2-9 do not apply.
- (d) There are no other 326 IAC 8 Rules that are applicable to the lamination & boron nitride coating operations.

Solvent Cleaning

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The solvent cleanup activities performed in the lamination operation, are specifically exempted from the requirements of 326 IAC 6-3-2, since the application of solvents for cleaning and degreasing not considered an application of surface coatings, as defined in 326 IAC 6-3-1.5(5) because it does not have a potential to emit particulate. Therefore, the requirements of 326 IAC 6-3-2 do not apply, and are not included in the permit.
- (b) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
The unlimited potential to emit VOC from the solvent cleanup activities performed in the lamination operation is less than twenty-five (25) tons per year, therefore, the requirements of 326 IAC 8-1-6, do not apply, and are not included in the permit.
- (c) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The solvent cleanup activities performed in the lamination operation are not of a type as described in subdivisions 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C), but are performed using hand application of solvents; therefore, the requirements of 326 IAC 8-3 do not apply, and are not included in the permit.
- (d) There are no other 326 IAC 8 Rules that are applicable to solvent cleanup activities performed in the lamination operation.

Natural Gas Combustion

- (a) 326 IAC 4-2-2 (Incinerators)
The ten (10) natural gas-fired furnaces (EU-1, EU-9, EU-11, EU-13, EU-14, EU-16, EU-19, EU-21, EU-22, and EU-28), the one (1) natural gas-fired hot water heater (EU-2), the one (1) natural gas-fired life test chamber (EU-12), the one (1) natural gas-fired pilot production tester (EU-17), the one (1) natural gas-fired pilot audit tester (EU-18), and the two (2) natural gas-fired space heater(s) (EU-7 and EU-29), are each not an incinerator, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, the requirements of 326 IAC 4-2-2 (Incinerators) do not apply, and are not included in the permit.
- (b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
- (1) The ten (10) natural gas-fired furnaces (EU-1, EU-9, EU-11, EU-13, EU-14, EU-16, EU-19, EU-21, EU-22, and EU-28), the one (1) natural gas-fired life test chamber (EU-12), the one (1) natural gas-fired pilot production tester (EU-17), the one (1) natural gas-fired pilot audit tester (EU-18), and the two (2) natural gas-fired space heater(s) (EU-7 and EU-29), each do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore,

the requirements of 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units) do not apply, and are not included in this permit.

- (2) The one (1) 0.34 MMBtu/hr natural gas-fired hot water heater (EU-2), constructed in 1990, after the rule applicability date of September 21, 1983, each must comply with the requirements of 326 IAC 6-2-4, as follows:

The emission limitation for these units, as provided in 326 IAC 6-2-4, is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Emission rate limit (lbs PM per MMBtu)

Q = Total source heat input capacity rating in million Btu per hour

= 0.34 MMBtu per hour

However, according to 326 IAC 6-2-4(a), for Q less than ten (10) MMBtu per hour, Pt shall not exceed six tenths (0.6) lbs PM per MMBtu. Therefore, the one (1) hot water heater is limited to six tenths (0.6) lbs of PM per MMBtu heat input.

Based on Appendix A and AP-42, the potential PM emission rate is 1.90 pounds per million cubic feet of natural gas or 0.0019 pounds per million British thermal units. Therefore, the one (1) hot water heater is able to comply with this particulate emission rate without the use of a control device.

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

The ten (10) natural gas-fired furnaces (EU-1, EU-9, EU-11, EU-13, EU-14, EU-16, EU-19, EU-21, EU-22, and EU-28), the one (1) natural gas-fired hot water heater (EU-2), the one (1) natural gas-fired life test chamber (EU-12), the one (1) natural gas-fired pilot production tester (EU-17), the one (1) natural gas-fired pilot audit tester (EU-18), and the two (2) natural gas-fired space heater(s) (EU-7 and EU-29), each, do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2). Therefore, each of these units is exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), and the requirements are not included in this permit.

- (d) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

The potential SO₂ emissions from the ten (10) natural gas-fired furnaces (EU-1, EU-9, EU-11, EU-13, EU-14, EU-16, EU-19, EU-21, EU-22, and EU-28), the one (1) natural gas-fired hot water heater (EU-2), the one (1) natural gas-fired life test chamber (EU-12), the one (1) natural gas-fired pilot production tester (EU-17), the one (1) natural gas-fired pilot audit tester (EU-18), and the two (2) natural gas-fired space heater(s) (EU-7 and EU-29), each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, the requirements of 326 IAC 7-1.1-2 do not apply, and are not included in this permit.

Compliance Determination, Monitoring, and Testing Requirements

Compliance Determination Requirements

- (a) The dust collector for particulate control in the Electric Arc Thermal Spraying Booth shall be in operation and control emissions at all times that the Electric Arc Thermal Spraying process is in operation.
- (b) The dust collector for particulate control in the Billet Machining Operations, including the milling, cutting, and slicing activities, shall be in operation and control emissions at all times that the Billet Machining Operations, including the milling, cutting, and slicing activities, are in operation.

- (c) The filter separator and dust collector for particulate control in the TRINCO shotblast cabinet shall be in operation and control emissions at all times that the TRINCO shotblast cabinet is in operation.
- (d) There are no specific compliance determination requirements for any of the other emission units at this source.

Testing requirements

- (a) During this review period, the source submitted documentation to support the CARB PM and HAP emission factors for electric arc thermal spraying. IDEM has reviewed the study methodology and determined that the emission factors be allowed. However, pursuant to Air-014-NPD, IDEM has determined that testing will be required to confirm the validity of the emission factors to the electric arc thermal spraying process at SCP Limited, Inc., because without a valid test, IDEM does not have adequate information to conclude that the Electric Arc Thermal Spraying Booth, identified as EU-27, actually operates in compliance with 326 IAC 2-6.1, 326 IAC 2-2, and 326 IAC 6-3.

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Electric Arc Thermal Spraying	Torit Dust Collector	Nickel	No later than 180 days after initial start up.	One (1) time to confirm emission factor

- (b) There are no specific testing requirements for any of the other emission units at this source.

Compliance Monitoring Requirements

- (a) The control equipment for the Electric Arc Thermal Spraying Booth, Billet Machining Operations, and TRINCO Blast Cabinet, have applicable compliance monitoring conditions as follows:

Monitoring Requirements					
Emission Unit	Control Device	Parameter	Frequency	Range	Excursions and Exceedances
Electric Arc Thermal Spraying Booth	Torit Dust Collector, exhausting inside the building	Pressure Drop	Once per day	2.0 to 8.0 inches	Response Steps
Billet Machining Operations	Torit Dust Collector, exhausting inside the building	Pressure Drop	Once per day	2.0 to 8.0 inches	Response Steps
TRINCO Blast Cabinet	filter separator and dust collector	Pressure Drop	Once per day	2.0 to 8.0 inches	Response Steps

These monitoring conditions are necessary because the above-listed control devices must operate properly to ensure compliance with 326 IAC 2-6.1(MSOP), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

- (b) There are no specific compliance monitoring requirements for any of the other emission units at this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 13, 2012.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M033-32010-00107. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Uncontrolled Potential Emissions (tons/year)										
Category	Emissions Generating Activity									TOTAL
	Pollutant	Electric Arc Thermal Spraying	Billet Machining	Abrasive Blasting	Lamination Operations	Solvent Cleaning	Boron Nitride Coating Operation	Natural Gas Combustion (multiple units)	Miscellaneous Activities (multiple units)	
Criteria Pollutants	PM	15.33	39.51	0.58	0.03	0	7.87E-04	0.02	10.00	65.47
	PM10	15.33	39.51	0.58	0.03	0	7.87E-04	0.06	10.00	65.51
	PM2.5	15.33	39.51	0.58	0.03	0	7.87E-04	0.06	10.00	65.51
	SO2	0	0	0	0	0	0	0.005	0	0.005
	NOx	0	0	0	0	0	0	0.81	0	0.81
	VOC	0	0	0	0.01	17.96	0.09	0.04	5.00	23.10
	CO	0	0	0	0	0	0	0.68	0	0.68
	GHGs as CO2e	0	0	0	0	0	0	979.34	0	979.34
Hazardous Air Pollutants	Benzene	0	0	0	0	0	0	1.70E-05	***	1.70E-05
	Dichlorobenzene	0	0	0	0	0	0	9.73E-06	***	9.73E-06
	Formaldehyde	0	0	0	0	0	0	6.08E-04	***	6.08E-04
	Hexane	0	0	0	0.002	0	0	0.015	***	0.017
	Toluene	0	0	0	0	0	0	2.76E-05	***	2.76E-05
	Cadmium	0	0	0	0	0	0	8.92E-06	***	8.92E-06
	Chromium	0	0	0	0	0	0	1.14E-05	***	1.14E-05
	Lead	0	0	0	0	0	0	4.06E-06	***	4.06E-06
	Manganese	0	0	0	0	0	0	3.08E-06	***	3.08E-06
	Nickel	0.25	0	0	0	0	0	1.70E-05	***	0.25
	Totals	0.25	0	0	2.41E-03	0	0	0.02	< 2.50	2.77
										< 2.50

Total emissions based on rated capacity at 8,760 hours/year.

*** These activities include resistance welding, laser scribing, silk screening, hand mixing, mold making, casting, billet slurry mixing and casting, potting, binder burnout, manual loading and unloading operations, activities performed using hand-held equipment, and paved and unpaved parking lots, each of which meet the definition of an insignificant or trivial activity, as defined in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). A conservative estimate has been formed based on confidential information submitted by the source. The potential to emit any single HAP is estimated at less than 2.50 tons/yr and the potential to emit any combination of HAPs is estimated at less than 2.50 tons/yr.

**Appendix A: Emission Calculations
Particulate and Hazardous Air Pollutant (HAP) Emissions
from the Electric Arc Thermal Spraying Operation**

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Particulate (PM) Emissions

Material	Maximum Material Throughput Rate (lbs/hour)	Weight % Solids	Transfer Efficiency (%)	Uncontrolled PTE PM (lbs/hr)	Uncontrolled PTE PM (tons/year)	326 IAC 6-3 Process Weight Rate (lbs/hr)	326 IAC 6-3 Allowable PM Emissions (lbs/hr)
Wire	10.00	100%	65%	3.50	15.33	19.50	0.551

NOTES

PTE = Potential to Emit
 Transfer efficiency assumed to be 65%
 Control efficiency assumed to be 98%
 PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

Control Efficiency =	98%	98%
Controlled PTE PM =	0.07	0.31

METHODOLOGY

Uncontrolled PTE PM (lbs/hr) = Max. Throughput Rate (lb/hour) * Weight % Solids * (1-Transfer Efficiency (%))
 Uncontrolled PTE PM (tons/year) = Max. Throughput Rate (lb/hour) * Weight % Solids * 1 ton/2000 lbs * 8760 hrs/yr * (1-Transfer Efficiency (%))
 Controlled PTE PM = Uncontrolled PTE PM * (1- Control Efficiency (%))

326 IAC 6-3-2(e) ALLOWABLE RATE OF EMISSIONS

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour. The source is able to comply with this limit using a control device.

Hazardous Air Pollutant (HAP) Emissions

Material	Maximum Material Throughput Rate (lbs/hour)	Weight % Nickel	Max. Throughput Nickel (lbs Ni sprayed/hr)	Emission Factor for Nickel* (lbs Ni/lbs Ni sprayed)	Uncontrolled PTE of Nickel (tons/yr)
Wire	10.00	95%	9.50	6.00E-03	0.25

NOTES

PTE = Potential to Emit
 * Uncontrolled Thermal Spraying Emission Factor for Nickel from Twin-Wire Electric Arc Spray taken from Title 17, California Code of Regulations, Section 93102.5, "Airborne Toxic Control Measure to Reduce Emissions of Hexavalent Chromium and Nickel from Thermal Spraying", Appendix 1 – Emission Calculation Method, pages 21 through 23 of 35. (<http://www.arb.ca.gov/regact/thermspr/finreg.pdf>).

Control Efficiency =	98%
Controlled PTE =	0.005

METHODOLOGY

Max. Throughput Nickel (lbs Ni sprayed/hr) = Maximum Material Throughput Rate (lbs/hour) * Weight % Nickel
 Uncontrolled PTE of Nickel (tons/yr) = Max. Throughput Nickel (lbs/hr) * Emission Factor Nickel (lbs Ni/lbs Ni sprayed) * 8760 hrs/yr * 1 ton/2000 lbs

**ATSD Appendix A: Emission Calculations
Particulate (PM/PM10/PM2.5) Emissions
From the Billet Machining Operations**

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Emission Unit	Maximum Throughput Rate (lbs/hr)	Uncontrolled PM Emission Factor ⁽¹⁾ (lbs/lbs)	Uncontrolled PM Emissions* (lbs/hr)	Uncontrolled PTE of PM* (tons/yr)	Controlled PM Emissions* (lbs/hr)	Controlled PTE of PM* (tons/yr)	326 IAC 6-3 Process Weight Rate (lbs/hr)	326 IAC 6-3 Allowable PM Emissions (lbs/hr)
Billet Machining	20.0	0.451	9.02	39.51	0.45	1.98	20.0	0.551

METHODOLOGY

Uncontrolled PTE (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs of throughput)

Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

Controlled PTE (lbs/hr) = Uncontrolled PTE (lbs/hr) * (1 - Torit Dust Collector Control Efficiency)

Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) * (1 - Torit Dust Collector Control Efficiency)

NOTES

Total emissions based on rated capacity of 8,760 hours/year.

The machining operations are controlled by a Torit Dust Collector with a control efficiency of 95% or greater.

⁽¹⁾ The Emission factor for PM is based on assumptions formed from a mass balance study performed by the source. IDEM has determined that a test will not be required to confirm this emission factor.

* In the absence of valid PM10 and PM2.5 emission factors, these emissions are assumed equal to PM emissions.

326 IAC 6-3-2(e) ALLOWABLE RATE OF EMISSIONS

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour. The source is able to comply with this limit using a control device.

**Appendix A: Emission Calculations
Particulate Emissions from the
Abrasive Blasting and Billet Machining Operations**

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Unit	Unit ID	Time needed to process 1 cycle (hrs)	Number of tiles per cycle	Initial Mass of each tile (lbs)	Initial Mass of each cycle (lbs)	Final Mass of each tile (lbs)	Final Mass of each cycle (lbs)	PM Emissions		
								Material Lost per cycle (lbs)	Material Lost per hour (lbs/hr)*	Material Lost per year (tons/yr)
TRINCO Blast Cabinet	EU-30	0.75	15	0.143	2.14	0.136	2.04	0.099	0.132	0.58

NOTES

The TRINCO Blast Cabinet is used to clean tiles. It takes 45 minutes, or 45/60 = 0.75 hours, to process a "cycle", and a maximum of 15 tiles can be processed per cycle.

The source conducted a mass balance study and has determined that a single tile initially weighed 64.66 grams, and then after being cleaned in the blasting cabinet weighed 61.66 grams. These values have been converted to pounds for the purposes of these calculations.

To form a conservative estimate, it is assumed that all material lost equals PM emissions.

PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

METHODOLOGY

Constants: 60 minutes = 1 hour, 1 gram = 0.0022046226218 pounds

Mass of each Tile (lbs) = [Mass of each Tile (grams) * (0.0022046226218 lbs/1 gram)]

Initial Mass of each cycle (lbs) = [Number of tiles per cycle * Initial Mass of each tile (lbs)]

Final Mass of each cycle (lbs) = [Number of tiles per cycle * Final Mass of each tile (lbs)]

Material Lost each cycle (lbs) = [Initial Mass of each cycle (lbs) - Final Mass of each cycle (lbs)]

Material Lost per hour (lbs/hr) = [(Material Lost per cycle (lbs) / Time needed to process 1 cycle (hrs)]

Material Lost per year (tons/yr) = [Material Lost per hour (lbs/hr) * (8760 hours / 1 year) * (2000 lbs / 1 ton)]

326 IAC 6-3-2(e) ALLOWABLE RATE OF EMISSIONS

*Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes where potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3.

**Appendix A: Emission Calculations
Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emissions
from Adhesive Usage in the Lamination Operations**

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Material	Material Usage (lbs/unit)	Maximum Throughput Capacity (unit/hour)	Weight % Solids	Transfer Efficiency (%)	PM Emissions (lbs/hr)	PM Emissions (ton/yr)	Weight % VOCs	VOC Emissions (lbs/hr)	VOC Emissions (ton/yr)	Weight % Hexane	Hexane Emissions (lbs/hr)	Hexane Emissions (ton/yr)
Aerosol Spray Adhesive	0.0006875	50	60.0%	65%	0.01	0.034	8.6%	0.0030	0.0129	1.6%	0.0006	0.0024

NOTES

The VOC content less water and exempt solvents as reported on the MSDS is 468 g/l of coating. Converted, this becomes 3.91 pounds per gallon of coating. This coating is applied by hand using an aerosol spray can. The transfer efficiency is assumed to be 65%. PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

METHODOLOGY

PM Emission rate (lbs/hr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight % Solids * (1 - Transfer Efficiency (%))

PM Emission rate (tons/yr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight % Solids * (1 - Transfer Efficiency (%)) * 8760 hrs/yr * 1 ton/2000 lbs

VOC/HAP Emission rate (lbs/hr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight %

VOC/HAP Emission rate (tons/yr) = Material Usage (lbs/unit) * Maximum Throughput Capacity (unit/hour) * Weight % * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Volatile Organic Compound (VOC) Emissions
From the Solvent Cleaning associated with the Lamination Operation

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Solvent Used	VOC content of Solvent (Density) (lbs/gal)	Daily Material Usage (daily replacement volume) (gal/workday)	Hours of Operation (hrs/workday)	Maximum Material Usage (gal/hr)	VOC PTE (tons/year)
2-Propanol	6.56	5.0	8.0	0.63	17.96

NOTES

The "Daily Material Usage" and "Hours of Operation" were provided by the source. Estimate is for 8760 hours of operation. Based on the MSDS submitted by the source, the material being used does not contain any hazardous air pollutants. The solvent is applied by hand using a rag; therefore, particulate emissions are determined negligible.

METHODOLOGY

Maximum Material Usage (gal/hr) = [Daily Material Usage (daily replacement volume) (gal/workday) / (Hour of Operation (hrs/workday))]
VOC PTE (tons/yr) = VOC Content (lbs/gal) * Maximum Material Usage (gal/hr) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Volatile Organic Compound (VOC) Emissions
from the Boron Nitride Coating Operation**

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Material	Material Density (lbs/gal)	Maximum Material Usage (gal/hr)	Weight % Solids	Transfer Efficiency (%)	PM Emissions (lbs/hr)	PM Emissions (ton/yr)	Weight % VOCs	VOC Emissions (lbs/hr)	VOC Emissions (ton/yr)
Boron Nitride	4.59	0.0049	10.0%	65%	1.80E-04	7.87E-04	90.0%	0.020	0.089

NOTES

Maximum material usage provided by the source as 10.0 gal/yr. This has been converted to gal/hr using the assumption of 8 hrs/day, 5 days/wk, and 51 wks/yr (2040 hrs/yr).

The VOC content less water and exempt solvents as reported on the MSDS is 500-550 g/l of coating. Converted, this becomes 4.17 - 4.59 lbs/gal of coating.

Based on the MSDS submitted by the source, the material being used in this operation does not contain any hazardous air pollutants.

This coating is applied by hand using an aerosol spray can. The transfer efficiency is assumed to be 65%.

PM, PM10, and PM 2.5 emissions are assumed equal (i.e., PM=PM10=PM2.5).

METHODOLOGY

PM Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % Solids * (1-Transfer Efficiency (%))

PM Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % Solids * (1-Transfer Efficiency (%)) * 8760 hrs/yr * 1 ton/2000 lbs

VOC Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % VOCs

VOC Emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % VOCs * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Criteria Pollutant and Hazardous Air Pollutant (HAP) Emissions
from Natural Gas Combustion (only)
MM BTU/HR <100

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Combustion Source	# of units	Heat Input per unit (MMBtu/hr)	Total Heat Input (MMBtu/hr)
Furnaces (EU-1, EU-9, EU-11, EU-13, and EU-14)	5	0.100	0.50
Furnace (EU-16)	1	0.140	0.14
Furnace (EU-19)	1	0.075	0.08
Furnaces (EU-21 & EU-22)	2	0.105	0.21
Furnace (EU-28)	1	0.300	0.30
Hot water heater (EU-2)	1	0.340	0.34
740 life test chamber (EU-12)	1	0.040	0.04
740 pilot production tester (EU-17)	1	0.016	0.02
740 pilot audit tester (EU-18)	1	0.006	0.01
infrared space heater (EU-7)	1	0.100	0.10
infrared space heater (EU-29)	1	0.125	0.13
Total	16	1.35	1.85

Maximum Heat Input Capacity
MMBtu/hr

1.85

Potential Throughput
MMCF/yr

16.22

Criteria Pollutant Emissions

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0	5.5	84.0
					**see below		
Potential Emission in tons/yr	0.015	0.062	0.062	0.005	0.81	0.04	0.68

*PM emission factor is filterable PM only. PM10 & PM2.5 emission factors are filterable and condensable fractions combined.

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

HAPs Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	1.70E-05	9.73E-06	6.08E-04	0.015	2.76E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	4.06E-06	8.92E-06	1.14E-05	3.08E-06	1.70E-05

NOTES

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Total HAPs = 0.015 tons/yr

Worst Single HAP = 0.015 tons/yr

METHODOLOGY

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98).

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

**Appendix A: Emissions Calculations
Greenhouse Gas Emissions
from Natural Gas Combustion (only)
MM BTU/HR <100**

Company Name: SCP Limited, Inc.
Source Address: 1700 S. Indiana Ave., Auburn, IN 46706
Op. Permit No.: M033-32010-00107
Reviewer: Hannah L. Desrosiers

Maximum
Heat Input
Capacity
MMBtu/hr

HHV
mmBtu
mmscf
1000

Potential Throughput
MMCF/yr

1.85

16.22

	Greenhouse Gases (GHGs)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	973.41	0.019	0.018
Summed Potential Emissions in tons/yr	973.45		
CO2e Total in tons/yr	979.34		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21)
+ N2O Potential Emission ton/yr x N2O GWP (310).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Jerry Reynolds
SCP Limited, Inc.
1700 S Indiana Avenue
Auburn, IN 46706

DATE: September 20, 2012

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

SUBJECT: Final Decision
Minor Source Operating Permit
033-32010-00107

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 20, 2012

TO: Eckhart Public Library

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

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

Applicant Name: SCP Limited, Inc.
Permit Number: 033-32010-00107

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 9/20/2012 SCP Limited Inc 033-32010-00107 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Jerry Reynolds SCP Limited Inc 1700 S Indiana Ave Auburn IN 46706 (Source CAATS) via confirmed delivery								1		
2		Jim Buchanan Owner SCP Limited Inc PO Box 560 Auburn IN 46706 (RO CAATS)										
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)										
5		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
6		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
7		Mr. Dave Weilbaker 1423 Urban Ave Auburn IN 46706 (Affected Party)										
8		DeKalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
9		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
10		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
11		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
12		Eckhart Public Library 603 South Jackson Street Auburn IN 46706 (Library)										
13												
14												
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