

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION

Von Duprin
2720 Tobey Drive
Indianapolis, Indiana 46219

Von Duprin (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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-6983-00050	
Issued by: Robert F. Holm, PhD. Administrator Environmental Resources Management Division	Issuance Date:

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

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

The Permittee owns and operates a stationary source that is an architectural products manufacturer and supplier that surface coats and powder coats miscellaneous metal parts. The source also is a decorative chromium electroplater.

Responsible Official: Scott Duncan
Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
SIC Code: 3479, 3471, 3442 and 3469
County Location: Marion
County Status: Nonattainment for PM
Attainment for all other criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or Emission Offset Rules;
Area Source, Section 112 of the Clean Air Act

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

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

- (1) Ransburg Electrostatic Disc Paint Spray Booth for automated solvent borne surface coating and clear lacquering of miscellaneous metal parts. Identified as Emission Unit ID SC-1 and exhausting at Stack/Vent ID 3. Maximum coating consumption capacity of 2.49 gallons of coating per hour. Equipped with dry filters for over spray control. Includes the use of a Ransburg dry off oven identified as Emission Unit ID CU-8 and Stack/Vent ID 18 and burning natural gas at a maximum capacity of 0.8 million Btu per hour. Also, includes the use of a Ransburg Curing Oven identified as Emission Unit ID CU-4 and Stack/Vent ID 2 and burning natural gas at a maximum capacity of 1.2 million Btu per hour. Installation date of 1986.
- (2) Binks Manual Paint Spray booth for airless spraying of solvent borne surface coatings and clear lacquering of miscellaneous metal parts. Identified as Emission Unit ID SC-2 and exhausting at Stack/Vent ID 7. Maximum coating consumption capacity of 0.15 gallons of coating per hour. Equipped with dry filters for over spray control. Includes the use of a Ransburg Curing Oven identified as Emission Unit ID CU-4 and Stack/Vent ID 2 and burning natural gas at a maximum capacity of 1.2 million Btu per hour. Installation date of 1986.
- (3) Single Hoist Line decorative chromium electroplating line identified as Emission Unit ID SHL-5. Includes Tank # 20 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 20 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 5. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.

- (4) Dual Hoist Line decorative chromium electroplating line identified as Emission Unit ID DHL-13. Includes Tank # 58 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 58 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 16. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.
- (5) Six (6) Acme Robotic Polishing Units identified as Emission Unit ID PU-6A for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift with each unit weighing, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6A and exhausting back in to the building. One (1) of the six (6) Polishing Units, at Exemption level, is being installed in 1998. Installation date of 1986.
- (6) Twenty four (24) Hand Polisher Work Station Units identified as Emission Unit ID PU-6B for polishing miscellaneous metal parts at a maximum capacity of 250 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6B and exhausting back in to the building. Installation date of 1986.
- (7) Seven (7) Acme Robotic Polishing Units and one (1) Acme Buffing Unit identified as Emission Unit ID PU-8 for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift and maximum capacity for the Buffing Unit of 500 units per eight hour shift. Each unit weighs, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 8 and exhausting back in to the building. Two (2) of the seven (7) Polishing Units, at Exemption level, are being installed in 1998. Installation date of 1986.

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

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Orr and Sembower natural gas fired boiler identified as Emission Unit ID CU-1 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (3) Dunham Bush natural gas fired boiler identified as Emission Unit ID CU-2 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (4) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6,
- (5) Applications of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (6) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (7) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C or
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C.

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (9) Closed loop heating and cooling systems.
- (10) Infrared cure equipment.
- (11) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAPs.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.
- (13) Paved and unpaved roads and parking lots with public access.
- (14) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (15) Equipment used to collect any material that might be released during a malfunction, process upset or spill cleanup including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (16) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
- (17) On site fire and emergency response training approved by the department.
- (18) Grinding and machining operations controlled by fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate of less than or equal to 4000 acfm including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (19) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (20) Kolene Molten Salt Paint Stripping Bath for stripping paint racks identified as Emission Unit ID CU-9. Equipped with natural gas fired burner system at maximum heat input capacity of 1.8 million Btu per hour.
- (21) Powder coating of miscellaneous metal parts in powder coating spray booths identified as Emission Unit ID PB-1, PB-2 and PB-3 at a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a cartridge dust collector exhausting back in to the building. Equipped with a natural gas fired dry off oven identified as Emission Unit ID CU-10 with a maximum heat input capacity of 1.0 million Btu per hour and exhausting at Stack/Vent ID 22. Also, equipped with two (2) powder coating natural gas fired cure ovens identified as Emission Unit ID CU-11 and CU-12 each with a maximum heat input capacity of 2.5 million Btu per hour and exhausting at Stack/Vent ID 23 and 24.
- (22) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as Emission Unit ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a Torit cartridge dust collector and exhausting at Stack/Vent ID PB-14. Equipped with a natural gas fired cure oven identified as Emission Unit ID CU-7 with a maximum heat input capacity of 0.8 million Btu per hour and exhausting at Stack/Vent ID 14.
- (23) Turbo Disk room spray can paint spray booth. Maximum capacity is rated at one quart per day.
- (24) One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-1 for polishing miscellaneous metal parts at a maximum capacity of 576 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 1A. Installation date of 1998.

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

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

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

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

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and ERMD may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)] [326 IAC 2-8-5(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and ERMD may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (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;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

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

IDEM, OAM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from permit requirements (for emergencies see Section B.14 - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the responsible official as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.
- (e) Deviations from permit requirements for decorative chromium electroplating shall be reported pursuant to 40 CFR Part 63 Subpart N and Section D.2 of this permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM and ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10][326 IAC 2-8-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.21 Operational Flexibility [326 IAC 2-8-15]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and ERMD or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and ERMD nor an authorized representative, may disclose the information unless and until IDEM, OAM, and ERMD makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, and ERMD acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Credible Evidence [326 IAC 2-8-4(3)][62 Federal Register 8313][326 IAC 2-8-5]

Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period ;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18][40 CFR 61.140]

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

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Asbestos
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM,OAM.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address(es) so that it is received at least two (2) weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and ERMD, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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 no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provide the Permittee notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.11 Surface Tension Monitoring Specifications

Whenever a condition in this permit requires the measurement of surface tension in a chromium electroplating bath, the surface tension shall be measured pursuant to specifications as stated in 40 CFR Part 63 Appendix A Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities).

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C.8-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon request of an IDEM, OAM and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If IDEM, OAM and/or ERMD makes a written request to the Permittee, the Permittee shall furnish the record(s) within a reasonable time frame.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C.13 - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B.15 - Deviations from Permit Requirements and Conditions must be clearly identified in such reports.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Emission Unit ID SC-1	Facility Description [326 IAC 2-8-4(10)] Ransburg Electrostatic Disc Paint Spray Booth for automated solvent borne surface coating and clear lacquering of miscellaneous metal parts. Identified as Emission Unit ID SC-1 and exhausting at Stack/Vent ID 3. Maximum coating consumption capacity of 2.49 gallons of coating per hour. Equipped with dry filters for over spray control. Includes the use of a Ransburg dry off oven identified as Emission Unit ID CU-8 and Stack/Vent ID 18 and burning natural gas at a maximum capacity of 0.8 million Btu per hour. Also, includes the use of a Ransburg Curing Oven identified as Emission Unit ID CU-4 and Stack/Vent ID 2 and burning natural gas at a maximum capacity of 1.2 million Btu per hour. Installation date of 1986.
Emission Unit ID SC-2	Facility Description [326 IAC 2-8-4(10)] Binks Manual Paint Spray booth for airless spraying of solvent borne surface coatings and clear lacquering of miscellaneous metal parts. Identified as Emission Unit ID SC-2 and exhausting at Stack/Vent ID 7. Maximum coating consumption capacity of 0.15 gallons of coating per hour. Equipped with dry filters for over spray control. Includes the use of a Ransburg Curing Oven identified as Emission Unit ID CU-4 and Stack/Vent ID 2 and burning natural gas at a maximum capacity of 1.2 million Btu per hour. Installation date of 1986.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

The combined potential to emit VOC from Emission Unit ID SC-1 and SC-2 shall be limited to less than fifteen (15) pounds per day such that 326 IAC 8-2-9 does not apply.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations: Particulate Emission Limitations), PM emissions from Emission Unit ID SC-1 and SC-2 shall not exceed an allowable PM emission rate of 0.55 pounds per hour based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 20]

Pursuant to 326 IAC 2-8-4 (FESOP: Permit Content) and 326 IAC 20 (Hazardous Air Pollutants);

- (a) Any single regulated HAP emissions from surface coating operations in Emission Unit ID SC-1 and SC-2 shall not exceed 8.8 tons per rolling 365 consecutive day period.
- (b) Any combination sum of regulated HAPs emissions from Emission Unit ID SC-1 and SC-2 shall not exceed 23.4 tons per rolling 365 consecutive day period.

Any single HAP emissions and any combination sum of HAPs emissions are limited such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC limitation contained in Condition D.1.1 shall be determined on a daily basis using formulation data for coatings, thinners and cleanup solvents as supplied by the coating manufacturer and as applied by the Permittee. IDEM, OAM and/or ERMD reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Hazardous Air Pollutants (HAPs)

Compliance with the HAP limitation(s) contained in Condition D.1.3 shall be determined on a daily basis using formulation data for coatings, thinners and cleanup solvents as supplied by the coating manufacturer and as applied by the Permittee.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth Stack/Vent ID 3 and/or 7 while one or more of the booths are in operation.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C.13 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C.13 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1 and the HAPs emission limit(s) established in Condition D.1.3.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC/HAP usage for each day; and
 - (5) A three hundred and sixty five (365) day rolling sum of the weight of HAP(s) emitted for each compliance period.
- (b) To document compliance with Condition D.1.2 and Condition D.1.8, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C.16 - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and Condition D.1.3 shall be submitted to the address(es) listed in Section C.17 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Emission Unit ID SHL-5	Facility Description [326 IAC 2-8-4(10)] Single Hoist Line decorative chromium electroplating line identified as Emission Unit ID SHL-5. Includes Tank # 20 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 20 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 5. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.
Emission Unit ID DHL-13	Facility Description [326 IAC 2-8-4(10)] Dual Hoist Line decorative chromium electroplating line identified as Emission Unit ID DHL-13. Includes Tank # 58 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 58 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 16. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.

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

D.2.1 Chromium Electroplating NESHAP [40 CFR Part 63 Subpart N] [326 IAC 20-8]

The Permittee is subject to all applicable provisions of 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) and 326 IAC 20-8 (Hard and Decorative Chromium Electroplating and Anodizing Tanks).

- (a) Pursuant to 40 CFR Part 63 Subpart N and 326 IAC 20-8, each Chromium Electroplating tank in operation is subject to the following emission limitation:
 - (1) The surface tension of the chromium electroplating bath contained in each affected tank, under 40 CFR Part 63 Subpart N, shall not exceed forty-five (45) dynes per centimeter at any time during operation of the tank. The Permittee has chosen to accept this limitation in lieu of conducting a performance test which would determine the outlet chromium concentration and establish a site specific operating parameter that corresponds to compliance with 0.01 milligrams per dry standard cubic meter.
 - (2) Pursuant to 40 CFR Part 63.343(a)(1), the Permittee shall have achieved compliance with the emission limitations and standards of 40 CFR Part 63.342 no later than one (1) year after January 25, 1995.
- (b) Pursuant to 40 CFR Part 63.342(f)(3) and 326 IAC 20-8, the Permittee shall have prepared an Operation and Maintenance Plan and implemented it no later than one (1) year after January 25, 1995. The plan shall include the following elements:
 - (1) The plan shall specify the operation and maintenance criteria for each affected source and process monitoring and shall include a standardized checklist to document the operation and maintenance of this equipment.

- (2) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
 - (3) The plan shall include a systematic procedure for identifying malfunctions of process equipment, process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.
 - (4) If the Operation and Maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the Permittee shall revise the Operation and Maintenance plan within forty-five (45) days after such an event occurs.
 - (5) The Permittee shall keep the written Operation and Maintenance plan on record after it is developed to be made available for inspection, upon request, for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR Part 63 Subpart N. In addition, if the Operation and Maintenance plan is revised, the Permittee shall keep previous versions of the Operation and Maintenance plan on record to be made available for inspection, upon request, for a period of five (5) years after each revision to the plan.
- (c) Pursuant to 40 CFR Part 63.342(f) and 326 IAC 20-8, the Permittee shall be subject to the following work practice standards:
- (1) At all times, including startup, shutdown and malfunction, the Permittee shall operate and maintain any monitoring equipment in a manner consistent with good air pollution control practices and consistent with the Operation and Maintenance plan required by 40 CFR 63.342(f)(3).
 - (2) Malfunctions shall be corrected as soon as practical after their occurrence in accordance with the Operation and Maintenance plan required by 40 CFR 63.342(f)(3).
 - (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM and ERMD, which may include, but is not limited to, monitoring results; review of the Operation and Maintenance plan, procedures and records and inspection of the source.
- Based on the results of a determination made by IDEM, OAM and/or ERMD, IDEM, OAM and/or ERMD may require that the Permittee make changes to the Operation and Maintenance plan. Revisions to the plan may be required if;
- (a) The Plan does not address a malfunction that has occurred;
 - (b) Fails to provide for the operation of the affected source, the air pollution control techniques, or the process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices;
or
 - (c) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques or monitoring equipment as quickly as practicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID SHL-5 and Emission Unit ID DHL-13.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test these facilities by this permit. However, if testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with 40 CFR 63.344. Pursuant to 40 CFR 63.347(d), the Permittee shall notify IDEM, OAM and ERMD in writing no less than sixty (60) calendar days in advance of the test date and if requested, make available the test plan as described in 40 CFR 63.344(a). The written notification shall include the test protocol and shall be submitted to the addresses listed in Section C.8 - Performance Testing.

D.2.4 Chromium Electroplating NESHAP [40 CFR Part 63 Subpart N] [326 IAC 20-8]

Operation of any affected tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. Pursuant to 40 CFR Part 63.343(c)(5), the permittee shall monitor the surface tension of each chromium electroplating tank in operation according to the monitoring schedule as stated below;

- (a) The surface tension of each chromium electroplating tank in operation shall be monitored once every four (4) hours for the first forty (40) hours of tank operation with a stalagmometer or a tensionmeter pursuant to 40 CFR Part 63 Appendix A Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities).
- (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of tank operation, the surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there are no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM and ERMD, until an exceedance occurs.

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

- (c) Once an exceedance occurs through tank surface tension measurement, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in Condition D.2.4(b).
- (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed as stated in Condition D.2.4(b).

- (e) Operating time for chromium electroplating and anodizing is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.

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

D.2.5 Record Keeping Requirements

Pursuant to 40 CFR Part 63.346, the Permittee shall keep records of the following information:

- (a) Records of monitoring data required by 40 CFR 63.343(c)(5) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (b) The specific date and time of commencement and completion of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on control or monitoring equipment.
- (c) The total process operating time of Emission Unit ID SHL-5 and DHL-13 during the reporting period.
- (d) For sources using chemical fume suppressants with a wetting agent to comply with the standards, records of the date and time that fume suppressants are added to the electroplating bath(s).
- (e) All records shall be maintained for a period of five (5) years in accordance with 40 CFR Part 63.10(b)(1).

D.2.6 Reporting Requirements

- (a) Pursuant to 40 CFR Part 63.347(h) and within thirty (30) days after the end of the reporting period, the Permittee shall prepare an Ongoing Compliance Status summary report to document the on going compliance status of the affected source(s). The report shall be completed annually using the Ongoing Compliance Status Report form listed on page 47 of this Permit and, unless otherwise notified, shall be retained on site and shall be made available upon request by IDEM-OAM and ERMD. The reporting period begins July 25 of each year. The Ongoing Compliance Status Report shall contain the following information:
 - (1) The company name and address and date of the report.
 - (2) An identification of the operating parameter that is monitored for compliance determination.
 - (3) The relevant emission limitation or operating parameter value that corresponds to compliance with the emission limitation.
 - (4) The beginning and ending dates of the reporting period and the total operating time of the affected facilities during the reporting period.
 - (5) A brief description of the type of process performed in the affected source.
 - (6) The total duration of excess emissions during the reporting period.

- (7) A certification by a responsible official, including name, title and signature of the responsible official who is certifying the accuracy of the report, that the work practice standards of 40 CFR Part 63.342(f) were followed in accordance with the Operation and Maintenance plan.
 - (8) A description of any changes in monitoring, process or controls since the last reporting period.
- (b) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the Operation and Maintenance plan required by 40 CFR 63.342(f)(3), pursuant to 40 CFR 63.342(f)(3)(iv) the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event.

SECTION D.3

FACILITY OPERATION CONDITIONS

Emission Unit ID PU-6A	Facility Description [326 IAC 2-8-4(10)] Six (6) Acme Robotic Polishing Units identified as Emission Unit ID PU-6A for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift with each unit weighing, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6A and exhausting back in to the building. One (1) Polishing Unit at Exemption level is being installed in 1998. Installation date of 1986.
Emission Unit ID PU-6B	Facility Description [326 IAC 2-8-4(10)] Twenty four (24) Hand Polisher Work Station Units identified as Emission Unit ID PU-6B for polishing miscellaneous metal parts at a maximum capacity of 250 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6B and exhausting back in to the building. Installation date of 1986.
Emission Unit ID PU-8	Facility Description [326 IAC 2-8-4(10)] Seven (7) Acme Robotic Polishing Units and one (1) Acme Buffing Unit identified as Emission Unit ID PU-8 for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift and maximum capacity for the Buffing Unit of 500 units per eight hour shift. Each unit weighs, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 8 and exhausting back in to the building. Two (2) Polishing Units at Exemption level are being installed in 1998. Installation date of 1986.

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

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

- a) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from polishing operations in Emission Unit ID PU-6A, PU-6B and PU-8 shall each be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

- b) At a process weight rate of less than 100 pounds per hour for Emission Unit ID PU-6A and PU-8, PM emissions from each Emission Unit ID, pursuant to 326 IAC 6-3-2, shall be limited to 0.55 pounds per hour.
- c) At a process rate of 232.5 pounds per hour for Emission Unit ID PU-6B, PM emissions from Emission Unit ID PU-6B, shall be limited to 0.97 pounds per hour.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID PU-6A, PU-6B and PU-8 and its control device(s).

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

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

D.3.4 Visible Emissions Notations

- (a) Daily visible emission notations of the Emission Unit ID PU-6A, PU-6B and PU-8 stack exhaust(s) shall be performed during normal daylight operations when venting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.5 Cartridge Filter Inspections

An inspection shall be performed each calendar quarter of all cartridge filters controlling the polishing and buffing operations when venting directly to the atmosphere. A cartridge filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge filters shall be replaced.

D.3.6 Cartridge Filter Failure Detection

In the event that a cartridge filter failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the polishing and buffing unit(s) stack exhaust when venting directly to the atmosphere.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C.16 - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Insignificant Activities

- (1) Orr and Sembower natural gas fired boiler identified as Emission Unit ID CU-1 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (2) Dunham Bush natural gas fired boiler identified as Emission Unit ID CU-2 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (3) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.
- (4) Powder coating of miscellaneous metal parts in powder coating spray booths identified as Emission Unit ID PB-1, PB-2 and PB-3 at a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a cartridge dust collector exhausting back in to the building. Equipped with a natural gas fired dry off oven identified as Emission Unit ID CU-10 with a maximum heat input capacity of 1.0 million Btu per hour and exhausting at Stack/Vent ID 22. Also, equipped with two (2) powder coating natural gas fired cure ovens identified as Emission Unit ID CU-11 and CU-12 each with a maximum heat input capacity of 2.5 million Btu per hour and exhausting at Stack/Vent ID 23 and 24.
- (5) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as Emission Unit ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a Torit cartridge dust collector and exhausting at Stack/Vent ID PB-14. Equipped with a natural gas fired cure oven identified as Emission Unit ID CU-7 with a maximum heat input capacity of 0.8 million Btu per hour and exhausting at Stack/Vent ID 14.
- (6) One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-1 for polishing miscellaneous metal parts at a maximum capacity of 576 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 1A. Installation date of 1998.

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

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from Emission Unit ID CU-1 and Emission Unit ID CU-2 shall each be limited to 0.6 pounds per million Btu heat input.

This limitation is based on the following equation:

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

where: Pt = pounds of particulate matter (PM) emitted per million Btu heat input.
Q = Total source operating capacity rating in million Btu per hour heat input.

D.4.2 Particulate Matter (PM) [326 IAC 6-3]

- a) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from powder coating operations in Emission Unit ID PB-1, PB-2, PB-3 and PB-14 and the particulate matter (PM) emissions from polishing operations in Emission Unit ID PU-1 shall each be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

- b) At a process weight rate of less than 100 pounds per hour for Emission Unit ID PB-1, PB-2, PB-3, PB-14 and PU-1, PM emissions from each Emission Unit ID, pursuant to 326 IAC 6-3-2, shall be limited to 0.55 pounds per hour.

D.4.3 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirement

D.4.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of these facilities is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.4.1 and/or D.4.2 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
FESOP No.: F097-6983-00050

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.	
Please check what document is being certified:	
9	Annual Compliance Certification Letter
9	Test Result (specify) _____
9	Report (specify) _____
9	Notification (specify) _____
9	Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	
Signature: _____	
Printed Name: _____	
Title/Position: _____	
Date: _____	

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

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

Source Name: Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
FESOP Permit No.: F097-6983-00050

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (10) calendar days

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

FESOP Monthly Report

Source Name: Von Duprin
 Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 FESOP No.: F097-6983-00050
 Facility: Emission Unit ID SC-1 and Emission Unit ID SC-2
 Parameter: Combined HAP(s) Emissions from Emission Unit ID SC-1 and SC-2
 Limit: 8.8 tons per rolling 365 consecutive day period for any single HAP emissions;
 23.4 tons per rolling 365 consecutive day period for any combination sum of regulated HAPs emissions

Month: _____ Year: _____

Day	Single HAP emissions (tons/day)	365 day rolling sum single HAP emissions (tons/yr)	Combination sum HAPs emissions (tons/day)	365 day rolling combination sum HAPs emissions (tons/yr)	Day	Single HAP emissions (tons/day)	365 day rolling sum single HAP emissions (tons/yr)	Combination sum HAPs emissions (tons/day)
1					17			
2					18			
3					19			
4					20			
5					21			
6					22			
7					23			
8					24			
9					25			
10					26			
11					27			
12					28			
13					29			
14					30			
15					31			
16								

9No deviation occurred in this month.

9Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

FESOP Monthly Report

Source Name: Von Duprin
Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
FESOP No.: F097-6983-00050
Facility: Emission Unit ID SC-1 and Emission Unit ID SC-2
Parameter: Combined VOC Emissions from Emission Unit ID SC-1 and SC-2
Limit: Less than 15 pounds per day combined total VOC emissions from Emission Unit ID SC-1 & SC-2

Month: _____ Year: _____

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

9No deviation occurred in this month.

9Deviation/s occurred in this month.

Deviation has been reported on: _____

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

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

Source Name: Von Duprin
 Source Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 Mailing Address: 2720 Tobey Drive, Indianapolis, Indiana 46219
 FESOP No.: F097-6983-00050

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No Deviations Occurred this Reporting Period".		
9 NO DEVIATIONS OCCURRED this REPORTING PERIOD		
9 THE FOLLOWING DEVIATIONS OCCURRED this REPORTING PERIOD.		
Requirement <small>(eg. Permit Condition D.1.3)</small>	Number of Deviations	Date of each Deviation

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

ONGOING COMPLIANCE STATUS REPORT

Applicable Rule: 40 CFR Part 63, Subpart N--National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks
(Complete this page for each affected tank)

Plant Name: _____ Page #: _____ of _____

Street Address: _____ City: _____

Tank ID #: _____ Type of process (hard chrome, decorative, etc.): _____

Relevant emission limitation associated with this tank (in either dynes/cm, mg/dscm, or mg/hr if the special provisions of §63.344(e) were used for multiple sources controlled by a common control device): _____

Operating parameters (pressure drop, velocity pressure, surface tension, etc.), associated with this tank, that are monitored to demonstrate compliance: _____

Operating parameter value, or range of values, that correspond to compliance with the emission limitation: _____

Beginning and ending dates of the reporting period: _____

Total operating time of this individual tank during the reporting period: _____

For companies classified as a major source of hazardous air pollutants (HAP): Has the operating parameter associated with this tank ever deviated from the compliant value, or range of values, during this reporting period (thus indicating the emission limitation has been exceeded, resulting in more frequent reporting): _____

For companies not classified as a major source of HAP (i.e. an area source): List the amount of tank operating time that monitoring records show the operating parameter deviated from the compliant value, or range of values (thus resulting in more frequent reporting if the duration of the malfunction was long enough):

July _____ Oct. _____ Jan. _____ Apr. _____
Aug. _____ Nov. _____ Feb. _____ May _____
Sept. _____ Dec. _____ Mar. _____ June _____

If this is a hard chrome tank, and the company is limiting the maximum rectifier capacity in accordance with §63.342(c)(2), list the actual ampere-hours consumed (based on an amp-hr meter) by the individual tank:

July _____ Oct. _____ Jan. _____ Apr. _____
Aug. _____ Nov. _____ Feb. _____ May _____
Sept. _____ Dec. _____ Mar. _____ June _____

If the operation and maintenance plan required by §63.342 (f)(3) was not followed, provide an explanation of the reasons for not following the provisions and describe the actions taken for that event:

Describe any changes in tanks, rectifiers, control devices, monitoring, etc. since the last status report:

Additional comments:

Print or type the name and title of the Responsible Official for the plant:

Name: _____

Title: _____

The Responsible Official can be the owner, president, vice-president, secretary, treasurer, plant engineering supervisor, plant engineer, government official, or ranking military officer.

I certify that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan on file; and, that the information contained in this report is accurate and true to the best of my knowledge.

Signature: _____ Date: _____

The frequency for completing this report may be altered by the Air Compliance Branch.

Companies classified as area sources shall complete this report no later than 30 days after the end of the reporting period, and retain it on site, unless otherwise notified.

All major sources shall submit this report no later than 30 days after the end of the reporting period to the Indiana Department of Environmental Management:

IDEM - Office of Air Management / Attn: David Rice
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (1) Emission Unit ID SC-1 and SC-2 have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These Compliance Monitoring provisions are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations).

- (2) Emission Unit ID SHL-5 and DHL-13 have applicable compliance monitoring conditions as specified below:
 - (a) The surface tension of each chromium electroplating tank in operation shall be monitored once every four (4) hours for the first forty (40) hours of tank operation with a tensionmeter.
 - (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of tank operation, the surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there are no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an on going basis until an exceedance occurs. The minimum frequency of surface tension measurement prescribed by 40 CFR 63.343(c)(5) is once every forty (40) hours of tank operation.

- (c) Once an exceedance occurs through tank surface tension measurement, the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in Condition D.2.5(b).
- (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed as stated in Condition D.2.5(b).

These Compliance Monitoring provisions are necessary to ensure compliance with 40 CFR Part 63 Subpart N and 326 IAC 20-8.

- (3) Emission Unit ID PU-6A, PU-6B and PU-8 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of Emission Unit ID PU-6A, PU-6B and PU-8 shall be performed during normal daylight operations when process emissions are directed outdoors. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the cartridge filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These Compliance Monitoring provisions are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.
- (b) See attached calculations for detailed air toxic calculations (pages 7, 11, 12 and 13 of Appendix A).

Conclusion

The operation of this miscellaneous metal parts surface coating operation and decorative chromium electroplating will be subject to the conditions of the attached proposed **FESOP No. F097-6983-00050**.

**Office of Air Management
and
Indianapolis Environmental Resource Management Division (ERMD)
Air Quality Management Section**

Addendum to the
Technical Support Document for Federally Enforceable State Operating
Permit (FESOP)

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

F097-6983-00050

On April 9, 1998, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper, Indianapolis, Indiana, stating that Von Duprin had applied for a Federally Enforceable State Operating Permit (FESOP) relating to the operation of surface coating of miscellaneous metal parts with coatings and/or powders, decorative chromium electroplating and metal trimming and stamping of architectural hardware products. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

ERMD received written comments from Von Duprin and from Ann McIver, Joe Saligoe and David Rice with the Indiana Department of Environmental Management (IDEM) which are paraphrased below. In addition, the amended version includes all IDEM 6/05/98 FESOP Model revisions. Upon further review, the ERMD has decided to make the following changes to the FESOP:

Section A changes:

Comment # 1: Von Duprin and IDEM commented that all references to Emission Unit ID DHL-13 should include Tank # 58. In addition, the wet scrubber is a packed bed scrubber and the allowable limit, based on the use of a wetting agent, is 45 dynes per centimeter not per square centimeter. The wording for Emission Unit descriptions for Chromium Electroplating "...in lieu of..." should be changed to clearly reflect that a wetting agent is being used to demonstrate compliance and not a scrubber.

Response # 1: All references to Emission Unit ID DHL-13 now refer to Tank # 58. The Emission Unit descriptions in Section A.2(3), A.2(4) and Section D.2 have been changed and now state:

Dual Hoist Line decorative chromium electroplating line identified as Emission Unit ID DHL-13. Includes Tank # 58 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 58 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 16. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.

Comment # 2: Von Duprin commented that the metal products polished or powder coated in Emission Unit ID PU-6A, PU-6B, PU-8 and in Insignificant Activity Section A.3(21) and A.3(24) should not reference a specific metal product such as "aluminum push bar endcaps." Von Duprin stated that miscellaneous metal products are powder coated and/or polished in these units. Von Duprin stated this change would not increase the PM/PM10 potential to emit for these units. The Emission Unit Descriptions in Sections A.2(5), A.2(6), A.2(7), A.3(21), A.3(24), D.3 and D.4 have had the specific metal product processed in the Emission Unit dropped from the description and are replaced with the reference to "miscellaneous metal products."

Section B changes:

Comment # 3: IDEM commented that Section B.13 - Preventive Maintenance Plan that, pursuant to 40 CFR 63.342(f)(3), those portions of the Plan relating to chromium electroplating shall be prepared for implementation no later than the compliance date (no later than one (1) year after January 25, 1995). The Preventive Maintenance Plan, pursuant to Section B.13, had required the Plan to be implemented within ninety (90) days of FESOP issuance.

Response # 3: The Preventive Maintenance Plan is required pursuant to 326 IAC 2-8-3(c) and 326 IAC 1-6. The Operation and Maintenance Plan is required pursuant to the Chromium Electroplating NESHAP and would represent a different applicable requirement. Section B of the FESOP is meant to contain general provisions for any Emission Unit stated in the FESOP with 326 IAC 1-6 as an applicable requirement. Section D can contain applicable requirements specific to that Emission Unit. Therefore, no changes to Section B.13 have been made. However, Section D.2.1(b) has been revised to state:

Pursuant to 40 CFR Part 63.342(f)(3) and 326 IAC 20-8, the Permittee shall have prepared an Operation and Maintenance Plan implemented no later than one (1) year after January 25, 1995.

In addition, the Preventive Maintenance Plan requirement of Section D.2.2 has been revised to state:

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID SHL-5 and Emission Unit ID DHL-13.

Comment # 4: In regards to Section B.14 - Emergency Provisions, IDEM commented that reporting an emergency involving any equipment or process associated with Chromium Electroplating needs to include a statement of whether actions taken were consistent with the procedures stated in the Operation and Maintenance Plan as specified in 40 CFR Part 63.342(f)(3).

Response # 4: Section B is intended to be general provisions. Section D may have an applicable requirement specific to that Emission Unit. Reporting of exceedances under the Chromium Electroplating NESHAP is compiled in the ongoing compliance status report required pursuant to 40 CFR 63.347(h). The Operation and Maintenance plan has procedures the source should follow should the surface tension exceed 45 dynes per centimeter. If actions taken were inconsistent with the Operation and Maintenance plan, then the NESHAP requires reporting within a stipulated time frame. As a result, Section D.2.6(b) has been added to include this NESHAP requirement when reporting. Section D.2.6(b) states:

If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the Operation and Maintenance plan required by 40 CFR 63.342(f)(3), the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event.

Comment # 5: Also in regards to Section B.14 - Emergency Provisions, IDEM commented that the Operation and Maintenance plans developed for Chromium Electroplating has a forty five (45) day deadline period to revise the plan if the plan fails to address or inadequately addresses an emergency.

Response # 5: Section B.14 refers to Preventive Maintenance Plans and not the Operation and Maintenance plan required pursuant to the Chromium Electroplating NESHAP. Section B.14 is not modified. However, Section D.2.1(b)(4) has been revised and now states:

- (4) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the Permittee shall revise the Operation and Maintenance plan within forty-five (45) days after such an event occurs.

Comment # 6: IDEM commented that Section B.15 - Deviations from Permit Requirements and Conditions locks the source in to reporting Chromium Electroplating exceedances in to a ten (10) calendar day reporting schedule. The Chromium Electroplating NESHAP has its own reporting schedule and would seem to conflict with this FESOP requirement and cause additional reporting only required because a permit is required.

Response # 6: Section B.15 contains the statement, "Deviations from any permit requirement..." The Chromium Electroplating NESHAP does not require immediate reporting of exceedances. The increased frequency of surface tension monitoring and record keeping and reporting, pursuant to the ongoing compliance status report represents its own applicable requirements. Therefore, the word "any" has been deleted from Section B.15(a). Section B.15(d) has been added and now states:

- (d) Deviations from permit requirements for decorative chromium electroplating shall be reported pursuant to 40 CFR Part 63 Subpart N and Section D.2 of this permit.

Section C changes:

Comment # 7: IDEM commented that Section C.8 - Performance Testing contains a requirement to provide a written notification no later than thirty (35) days before the intended test date. The Chromium Electroplating NESHAP requires notification at least sixty (60) days in advance of the test date if the source wishes to stack test and demonstrate compliance with the limit not corresponding to the use of a wetting agent (0.01 milligrams per dry standard cubic meter).

Response # 7: Section C.8 already contains wording to allow for different or additional requirements that may be found elsewhere in the FESOP. Section D.2.3 - Testing Requirements has been amended to require a sixty (60) day advance written notification of the intended test date. The source will not need to stack test under this FESOP unless they wish to no longer use a wetting agent at which time 0.01 milligrams per dry standard cubic meter would become the allowable chromium compounds emission limitation. Section D.2.3 now states:

The Permittee is not required to test these facilities by this permit. However, if testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with 40 CFR 63.344. Pursuant to 40 CFR 63.347(d), the Permittee shall notify IDEM, OAM and ERMD in writing no less than sixty (60) calendar days in advance of the test date and if requested, make available the test plan as described in 40 CFR 63.344(a). The written notification shall include the test protocol and shall be submitted to the addresses listed in Section C.8 - Performance Testing.

Comment # 8: Von Duprin commented that Section C.18 - General Reporting Requirements requires Von Duprin to submit a Quarterly Compliance Report summarizing its compliance status over the reporting period. Under separate provisions, Von Duprin is required to submit an Annual Compliance Certification as well as deviation reports within ten days of the deviation from an applicable requirement. Von Duprin does not see the need for this additional quarterly compliance report and requests that it be deleted or reduced to semi-annual reporting.

Response # 8: The purpose of the FESOP is to limit the potential to emit for sources and for sources to demonstrate continuous compliance with emission limitations and standards. The provision, 326 IAC 2-8-4(3)(C)(I), which requires semi-annual reporting, actually refers to compliance monitoring requirements and not compliance with all FESOP requirements. Deviation reporting on the Quarterly Compliance Report Form should actually refer to deviations from compliance monitoring requirements. Deviations from emission limitations and standards should be reported on the Emergency/Deviation Occurrence Report Form. Semi-annual reporting is the minimum requirement if no other quarterly reporting is required. Because Von Duprin is already required to submit quarterly reports to demonstrate compliance with HAP's and VOC limitation(s) for Emission Unit ID SC-1 and SC-2, IDEM, OAM and ERMD does not feel that a quarterly compliance monitoring report would be excessive. IDEM feels that a period of time longer than every quarter usually will not provide sufficient reporting of continuous compliance monitoring. IDEM, OAM has revised the standard model condition for Section C.18 - General Reporting Requirements and the reporting Form requirement to reflect that the requirement of C.18(a) is for compliance monitoring. The title of the Quarterly Compliance Report is now changed to state "Quarterly Compliance Monitoring Report" and Section C.18(a) is now changed to state:

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

Section D changes:

Comment # 9: Von Duprin commented that Condition D.1.1 limits actual VOC emissions to no more than fifteen pounds per day and that Von Duprin expects to be fully in compliance with the limitation by June 1998. If the FESOP is issued prior to that date, Von Duprin wants the FESOP to state that compliance is not required until after June 1998.

Response # 9: Emission Unit ID SC-1 and SC-2 have been in existence since 1986. Compliance with 326 IAC 8-2-9 should have been demonstrated by July 1, 1991. Section D.1.1 VOC limits potential to emit such that 326 IAC 8-2-9 would not apply. The compliance method chosen by Von Duprin is necessary whether a FESOP was issued in 1997 or is to be issued. As of the date of this writing, Von Duprin has never been issued a Notice of Violation for exceeding VOC content of surface coatings despite having actual emissions exceeding fifteen pounds per day. However, a Request for Enforcement Action for violation of 326 IAC 8-2-9(d) has been forwarded May 13, 1998 to ERMD-Enforcement. No changes.

Comment # 10: Von Duprin requests that inspection of dry filters and rooftops for over spray should not be required because limiting VOC potential to emit to below fifteen pounds per day renders the Emission Units an Insignificant Activity.

Response # 10: Prior to the issuance of a FESOP, potential to emit HAP from Emission Unit ID SC-1 and SC-2 is above major source thresholds. Therefore, the Emission Units are not an Insignificant Activity. The FESOP enforceably restricts potential to emit and compliance with all applicable provisions would need to be demonstrated to determine continuous compliance with these provisions. No changes.

Comment # 11: Von Duprin requests that Section D.1.9 be changed to record keep coating and solvent on a monthly basis.

Response # 11: 326 IAC 8-1-1(c) states, "If the applicability level of the rule is in terms of actual emissions per day, the facility owner or operator shall be required to keep, at a minimum, daily consumption rates...and daily calculation of VOC emissions." Von Duprin is required to emit less than fifteen pounds of VOC per day. Tracking and record keeping and reporting should then be performed on a daily basis. No changes.

Comment # 12: Von Duprin requests that a variance received from an IDEM inspector on surface tension monitoring be included to state that surface tension monitoring be conducted once per normal operating day.

Response # 12: ERMD believes the approval, not a variance, received from an IDEM inspector is an alternative monitoring frequency for surface tension monitoring. The monitoring frequency approval meets the minimum requirement of 40 CFR 63.343(c) and can be followed, in compliance with the current FESOP Condition D.2.4. ERMD has received comments from IDEM during the FESOP comment period and the new Section D.2.4 is wording IDEM has suggested for this FESOP. Monitoring is allowed at any time interval provided it is no less frequent than once every forty (40) hours of tank operation and there are no exceedances or an alternative monitoring plan or monitoring frequency is approved by IDEM, OAM and ERMD. The interpretation of the monitoring frequency is no more than forty (40) operation hours can pass without monitoring the surface tension provided that no exceedances have occurred during the initial and subsequent monitoring schedule(s).

Comment # 13: IDEM, OAM had numerous comments on the wording and structure of Section D.2. Namely, the Operation and Maintenance plan and the work practice plan should be moved to the Emission Limitations and Standards Section of the FESOP. Stack testing notification deadlines and compliance dates should also have been included.

Response # 13: For the purposes of clarity, the entire Section D.2 had changes and is listed on the following pages:

SECTION D.2 FACILITY OPERATION CONDITIONS

Emission Unit ID SHL-5	Facility Description [326 IAC 2-8-4(10)] Single Hoist Line decorative chromium electroplating line identified as Emission Unit ID SHL-5. Includes Tank # 20 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 20 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 5. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.
Emission Unit ID DHL-13	Facility Description [326 IAC 2-8-4(10)] Dual Hoist Line decorative chromium electroplating line identified as Emission Unit ID DHL-13. Includes Tank # 58 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 58 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 16. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.

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

D.2.1 Chromium Electroplating NESHAP [40 CFR Part 63 Subpart N] [326 IAC 20-8]

The Permittee is subject to all applicable provisions of 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) and 326 IAC 20-8 (Hard and Decorative Chromium Electroplating and Anodizing Tanks).

- (a) Pursuant to 40 CFR Part 63 Subpart N and 326 IAC 20-8, each Chromium Electroplating tank in operation is subject to the following emission limitation:
 - (1) The surface tension of the chromium electroplating bath contained in each affected tank, under 40 CFR Part 63 Subpart N, shall not exceed forty-five (45) dynes per centimeter at any time during operation of the tank. The Permittee has chosen to accept this limitation in lieu of conducting a performance test which would determine the outlet chromium concentration and establish a site specific operating parameter that corresponds to compliance with 0.01 milligrams per dry standard cubic meter.
 - (2) Pursuant to 40 CFR Part 63.343(a)(1), the Permittee shall have achieved compliance with the emission limitations and standards of 40 CFR Part 63.342 no later than one (1) year after January 25, 1995.

- (b) Pursuant to 40 CFR Part 63.342(f)(3) and 326 IAC 20-8, the Permittee shall have prepared an Operation and Maintenance Plan and implemented it no later than one (1) year after January 25, 1995. The plan shall include the following elements:
- (1) The plan shall specify the operation and maintenance criteria for each affected source and process monitoring and shall include a standardized checklist to document the operation and maintenance of this equipment.
 - (2) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
 - (3) The plan shall include a systematic procedure for identifying malfunctions of process equipment, process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.
 - (4) If the Operation and Maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the Permittee shall revise the Operation and Maintenance plan within forty-five (45) days after such an event occurs.
 - (5) The Permittee shall keep the written Operation and Maintenance plan on record after it is developed to be made available for inspection, upon request, for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR Part 63 Subpart N. In addition, if the Operation and Maintenance plan is revised, the Permittee shall keep previous versions of the Operation and Maintenance plan on record to be made available for inspection, upon request, for a period of five (5) years after each revision to the plan.
- (c) Pursuant to 40 CFR Part 63.342(f) and 326 IAC 20-8, the Permittee shall be subject to the following work practice standards:
- (1) At all times, including startup, shutdown and malfunction, the Permittee shall operate and maintain any monitoring equipment in a manner consistent with good air pollution control practices and consistent with the Operation and Maintenance plan required by 40 CFR 63.342(f)(3).
 - (2) Malfunctions shall be corrected as soon as practical after their occurrence in accordance with the Operation and Maintenance plan required by 40 CFR 63.342(f)(3).
 - (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM and ERMD, which may include, but is not limited to, monitoring results; review of the Operation and Maintenance plan, procedures and records and inspection of the source.

Based on the results of a determination made by IDEM, OAM and/or ERMD, IDEM, OAM and/or ERMD may require that the Permittee make changes to the Operation and Maintenance plan. Revisions to the plan may be required if;

- (a) The Plan does not address a malfunction that has occurred;
- (b) Fails to provide for the operation of the affected source, the air pollution control techniques, or the process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
- (c) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques or monitoring equipment as quickly as practicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID SHL-5 and Emission Unit ID DHL-13.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test these facilities by this permit. However, if testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with 40 CFR 63.344. Pursuant to 40 CFR 63.347(d), the Permittee shall notify IDEM, OAM and ERMD in writing no less than sixty (60) calendar days in advance of the test date and if requested, make available the test plan as described in 40 CFR 63.344(a). The written notification shall include the test protocol and shall be submitted to the addresses listed in Section C.8 - Performance Testing.

D.2.4 Chromium Electroplating NESHAP [40 CFR Part 63 Subpart N] [326 IAC 20-8]

Operation of any affected tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. Pursuant to 40 CFR Part 63.343(c)(5), the permittee shall monitor the surface tension of each chromium electroplating tank in operation according to the monitoring schedule as stated below;

- (a) The surface tension of each chromium electroplating tank in operation shall be monitored once every four (4) hours for the first forty (40) hours of tank operation with a stalagmometer or a tensionmeter pursuant to 40 CFR Part 63 Appendix A Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities).
- (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of tank operation, the surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there are no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM and ERMD, until an exceedance occurs.

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

- (c) Once an exceedance occurs through tank surface tension measurement, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in Condition D.2.4(b).
- (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed as stated in Condition D.2.4(b).
- (e) Operating time for chromium electroplating and anodizing is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.

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

D.2.5 Record Keeping Requirements

Pursuant to 40 CFR Part 63.346, the Permittee shall keep records of the following information:

- (a) Records of monitoring data required by 40 CFR 63.343(c)(5) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (b) The specific date and time of commencement and completion of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on control or monitoring equipment.
- (c) The total process operating time of Emission Unit ID SHL-5 and DHL-13 during the reporting period.
- (d) For sources using chemical fume suppressants with a wetting agent to comply with the standards, records of the date and time that fume suppressants are added to the electroplating bath(s).
- (e) All records shall be maintained for a period of five (5) years in accordance with 40 CFR Part 63.10(b)(1).

D.2.6 Reporting Requirements

- (a) Pursuant to 40 CFR Part 63.347(h) and within thirty (30) days after the end of the reporting period, the Permittee shall prepare an Ongoing Compliance Status summary report to document the on going compliance status of the affected source(s). The report shall be completed annually using the Ongoing Compliance Status Report form listed on page 47 of this Permit and, unless otherwise notified, shall be retained on site and shall be made available upon request by IDEM-OAM and ERMD. The reporting period begins July 25 of each year. The Ongoing Compliance Status Report shall contain the following information:
 - (1) The company name and address and date of the report.
 - (2) An identification of the operating parameter that is monitored for compliance determination.

- (3) The relevant emission limitation or operating parameter value that corresponds to compliance with the emission limitation.
 - (4) The beginning and ending dates of the reporting period and the total operating time of the affected facilities during the reporting period.
 - (5) A brief description of the type of process performed in the affected source.
 - (6) The total duration of excess emissions during the reporting period.
 - (7) A certification by a responsible official, including name, title and signature of the responsible official who is certifying the accuracy of the report, that the work practice standards of 40 CFR Part 63.342(f) were followed in accordance with the Operation and Maintenance plan.
 - (8) A description of any changes in monitoring, process or controls since the last reporting period.
- (b) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the Operation and Maintenance plan required by 40 CFR 63.342(f)(3), pursuant to 40 CFR 63.342(f)(3)(iv) the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event.

Changes to Forms:

Pursuant to IDEM 6/05/98 FESOP Model revisions:

- 1) The Certification Form appearing on page 41 of 48 has had the Emergency/Deviation Occurrence Reporting Form box to check removed from the listing of forms that would be attached to the Certification Form if submitted.
- 2) The Emergency/Deviation Occurrence Report Form appearing on pages 42 and 43 of 48 had the following statement at the bottom of page removed: "Attach a signed Certification to complete this report."
- 3) As previously stated, the Quarterly Compliance Report previously appearing on page 46 of 48 of the draft FESOP has had a title change only and is now titled Quarterly Compliance Monitoring Report. In addition, the column for listing no deviations has been removed and replaced with a check box that no deviations have occurred. Also, the requirement to list each compliance monitoring requirement has been removed from the Form.

Pursuant to IDEM comment, an Ongoing Compliance Status Report Form has been added following the public comment period and appears on page 47 and 48 of 48. The report form is for an area source chrome electroplating operation (by way of the FESOP, they are now a minor HAP source and an area source for chrome) and does not need to be submitted annually only retained on site or submitted by request.

Changes to Technical Support Document (TSD):

The only change to the TSD other than the addition of this TSD Addendum is under the **Enforcement Issue** Section of the TSD, a Request for Enforcement Action has been forwarded May 13, 1998 to ERMD-Enforcement for possible violation of 326 IAC 8-2-9(d). IDEM, OAM requests that the Limited PTE Table from the TSD be listed again in any TSD Addendum(s). The Limited PTE Table has no changes after this Addendum and is listed below:

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Emission Unit ID SC-1 and SC-2. Ransburg and Binks Paint Spray Booth.	10.0	10.0	0.0	2.7	0.0	0.0	8.8/ 23.4
Emission Unit ID CU-4 and CU-8. Ransburg Dry off Oven and Ransburg Cure Oven	0.1	0.1	0.0	0.0	0.2	0.9	0.0
Emission Unit ID PU-6A. Six (6) Acme Robotic Polishing Units	2.4	2.4	0.0	0.0	0.0	0.0	0.0
Emission Unit ID PU-6B. Twenty Four (24) Hand Polishing Units	4.2	4.2	0.0	0.0	0.0	0.0	0.0

Emission Unit ID PU-8. Seven (7) Acme Robotic Polishing Units and one (1) Buffing Unit	2.4	2.4	0.0	0.0	0.0	0.0	0.0
Emission Unit ID SHL-5. Single Hoist Line	0.0	0.0	0.0	0.0	0.0	0.0	7.0E-04
Emission Unit ID DHL-13. Dual Hoist Line	0.0	0.0	0.0	0.0	0.0	0.0	7.0E-04
Insignificant Activities	6.8	6.8	0.0	3.0	1.8	8.2	0.6
Total Emissions	25.9	25.9	0.0	5.7	2.0	9.1	9.4/24

APPENDIX A

Appendix A: Emission Calculations
Decorative Chromium Electroplating with Fume Suppressant

**Decorative Chromium Electroplating
 Single Hoist Line (SHL-5; Tank 20)
 Dual Hoist Line (DHL-13; Tank 58)**

Company Name: Von Duprin
Address City IN Zip: 2720 Tobey Drive, Indpls., IN 46219
CP:
Plt ID: F097-6983-00050
Reviewer: MBC
Date: 02/24/98

1/96 stack test results = 0.0022 mg/dscm for each tank/stack including use of fume suppressant. Wet scrubber(s) are in place as well but credit no efficiency

AP-42 Table 12.20-1 = 1.20E-06 gr/dscf total Chromium Compounds
 (decorative with fume suppressant) 2.50E-06 gr/dscf total PM/PM10

conversion to mg/dscm multiply by = 2290

total dscf / acfm
 Single Hoist Line = 4300
 Dual Hoist Line = 4300

Each Tank			
total Chromium Compound:		PM/ PM10	
lbs/hr	tons/yr	lbs/hr	tons/yr
4.42E-05	1.94E-04	9.21E-05	4.04E-04
mg/ dscm			
0.0027			

notes:
 Total Chromium lbs/hr = AP-42 emfac in gr/dscf x dscfm x 60 min / 7000 gr per 1 lb
 mg/dscm = AP-42 emfac in gr/dscf x conversion factor
 stack testing included use of fume suppressant
 AP-42 emfac given no credit to use of a scrubber; scrubber is in place on each tank

total Chrome tons / yr
3.87E-04

0050calc.wk4