

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW (ENSR)
OFFICE OF AIR MANAGEMENT**

**Globe Valve Division of Gerber Plumbing Fixtures Corporation
1514 West Washington
Delphi, Indiana 46923**

(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 2-7 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.: T015-7521-00011	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary brass foundry.

Responsible Official: Tim Brownfield, Director of Operations
Source Address: 1514 West Washington, Delphi, IN 46923
Mailing Address: P.O. Box 278, Delphi, IN 46923
SIC Code: 3432, 3471
County Location: Carroll
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) charge handling process, identified as Charge Handling, with a maximum capacity of 3.13 tons metal per hour, with no controls and exhausting internally.
- (2) Three (3) electric induction furnaces, identified as Red Brass Furnaces, with a maximum capacity of 3.13 tons metal per hour, using a baghouse for control and exhausting to stack C8.
- (3) One (1) mold sand handling operation, identified as Mold Sand Handling System, with a maximum capacity of 45.28 tons sand per hour, using two (2) baghouses for control and exhausting to stacks C8 and C13.
- (4) One (1) pouring operation, identified as Red Brass Pouring, with a maximum capacity of 3.13 tons metal per hour and 45.28 tons sand per hour, using a baghouse for control, and exhausting to stack C8.
- (5) One (1) cooling operation, identified as Red Brass Cooling, with a maximum capacity of 3.13 tons metal per hour and 45.28 tons sand per hour, with no controls, and exhausting internally.
- (6) One (1) punchout, shakeout, and drum shakeout operation, in series, identified as Punchout, Shakeout, and Rotating Drum, with a maximum capacity of 3.13 tons metal per hour and 45.28 sand per hour, using a baghouse for control and exhausting to stack C13.
- (7) One (1) shotblasting operation utilized by Red and Yellow Brass operations, identified as Shotblast 1, Shotblast 2, and Shotblast 3, with a maximum capacity of 4.36 tons metal per hour, using a baghouse for control and exhausting to stack C10.

- (8) One (1) grinding operation utilized by Red and Yellow Brass operations, identified as Grinding, with a maximum capacity of 4.36 tons metal per hour, using a baghouse for control, and exhausting to stack C4.
- (9) One (1) sand reclaiming operation, identified as Sand Reclaiming System, with a maximum capacity of 1.0 tons sand per hour, using a baghouse for control and exhausting to stack C11.
- (10) One (1) brass reclaiming operation, identified as Brass Reclaiming System, with a maximum capacity of 0.01 ton metal per hour, using a baghouse for control, and exhausting to stack C9.
- (11) Two (2) charge handling operations, identified as Charge Handling, with a maximum capacity of 0.41 tons metal per hour per line, using no controls and exhausting internally.
- (12) Three (3) electric induction furnaces, identified as Yellow Brass Furnaces, with a maximum capacity of 0.41 tons metal per hour per furnace, using a baghouse for control, and exhausting to stack C12.
- (13) Three (3) permanent molding operations, identified as Yellow Brass Permanent Molding, with a maximum capacity 0.41 tons metal per hour per operation, using a baghouse for control and exhausting to stack C12.
- (14) One (1) dielectric core making operation, identified as Dielectric Core Making, with a maximum capacity of 259 pounds cores per hour, using no controls and exhausting internally.
- (15) Three (3) SO₂ core making operations, identified as SO₂ Core Making, with a maximum capacity of 160 pounds cores per hour per operation, using a wet scrubber for SO₂ control and exhausting to stack C15.
- (16) One (1) decorative chrome plating operation, identified as Decorative Chromium Plating, with a maximum capacity of 1,700 amp-hour per hour, using fume suppressant for control and exhausting through stack C16.
- (17) One (1) natural gas fired boiler, identified as B-1, maximum heat input rate of 16.4 million British thermal units per hour (mmBtu/hr), using no controls and exhausting to stack S-1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (1) Cleaners and solvents characterized by having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100E F).
- (2) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
- (3) One (1) oilsand core making operation, identified as Oilsand Core Making, with a maximum capacity of 50 pounds cores per hour, using no controls and exhausting internally.

- (4) One (1) electric induction holding furnace, identified as Red Brass Holding Furnace, with a maximum capacity of 3.13 tons metal per hour, using a baghouse for control and exhausting to stack C8.
- (5) One (1) core knockout operation, identified as Yellow Brass Knockout, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.
- (6) One (1) polishing and buffing operation, identified as Yellow Brass Polishing and Buffing, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.
- (7) One (1) shell core making operation, identified as Shell Core Making, with a maximum capacity of 500 pounds of cores per hour, using no controls and exhausting to the atmosphere.
- (8) Two (2) natural gas fired boilers, identified as Boiler B-2 and B-3, maximum heat input rate of 4.1 million British thermal units per hour (mmBtu/hr) and 8.2 million British thermal units per hour (mmBtu/hr), respectively, using no controls and exhausting to stacks S-2 and S-3.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

(a) 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 Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

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 2-7-5(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 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(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.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(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 2-7-4(b)] [326 IAC 2-7-5(6)(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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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, 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, 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, then 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 with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(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; or
 - (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.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, 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.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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, 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 based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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

- (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, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (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 2-7-16.
- (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 describe 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (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

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 2-7-5(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, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, 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 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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

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.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(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, 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 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, 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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. 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, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (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, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 until IDEM, OAM, 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, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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

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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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 2-7-20(a) and the following additional conditions:

- (a) 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) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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

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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (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 2-7-20(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 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). 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.23 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.24 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (a) Enter upon the Permittee's premises where a Part 70 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 2-7-6(6)]
 - (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, 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, nor an authorized representative, may disclose the information unless and until IDEM, OAM, 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, 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.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, 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 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 2-7-11. 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, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, 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.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

C.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]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 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 2-7-6(6)]

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
- 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 2-7-6(1)]

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

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

at least sixty (60) days before the intended test date for all chromium electroplating facilities and no later than thirty-five (35) days prior to the intended test date for all other facilities. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM 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, 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 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

in writing, prior to the end of the ninety (90) day compliance schedule, with full justification of the reasons for the 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.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable 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.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process 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, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, 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.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [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 upon request and shall be subject to review and approval by IDEM, OAM. 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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-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 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 stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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 the request of an IDEM, OAM, representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (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 - 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.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual 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
- (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, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual 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- Deviations from Permit Requirements 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.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) charge handling process, identified as Charge Handling, with a maximum capacity of 3.13 tons metal per hour, with no controls and exhausting internally.
- (2) Three (3) electric induction furnaces, identified as Red Brass Furnaces, with a maximum capacity of 3.13 tons metal per hour, using a baghouse for control and exhausting to stack C8.
- (3) One (1) mold sand handling operation, identified as Mold Sand Handling System, with a maximum capacity of 45.28 tons sand per hour, using two (2) baghouses for control and exhausting to stacks C8 and C13.
- (4) One (1) pouring operation, identified as Red Brass Pouring, with a maximum capacity of 3.13 tons metal per hour and 45.28 tons sand per hour, using a baghouse for control, and exhausting to stack C8.
- (5) One (1) cooling operation, identified as Red Brass Cooling, with a maximum capacity of 3.13 tons metal per hour and 45.28 tons sand per hour, with no controls, and exhausting internally.
- (6) One (1) punchout, shakeout, and drum shakeout operation, in series, identified as Punchout, Shakeout, and Rotating Drum, with a maximum capacity of 3.13 tons metal per hour and 45.28 sand per hour, using a baghouse for control and exhausting to stack C13.
- (7) One (1) shotblasting operation utilized by Red and Yellow Brass operations, identified as Shotblast 1, Shotblast 2, and Shotblast 3, with a maximum capacity of 4.36 tons metal per hour, using a baghouse for control and exhausting to stack C10.
- (8) One (1) grinding operation utilized by Red and Yellow Brass operations, identified as Grinding, with a maximum capacity of 4.36 tons metal per hour, using a baghouse for control, and exhausting to stack C4.
- (9) One (1) sand reclaiming operation, identified as Sand Reclaiming System, with a maximum capacity of 1.0 tons sand per hour, using a baghouse for control and exhausting to stack C11.
- (10) One (1) brass reclaiming operation, identified as Brass Reclaiming System, with a maximum capacity of 0.01 ton metal per hour, using a baghouse for control, and exhausting to stack C9.
- (11) Two (2) charge handling operations, identified as Charge Handling, with a maximum capacity of 0.41 tons metal per hour per line, using no controls and exhausting internally.
- (12) Three (3) electric induction furnaces, identified as Yellow Brass Furnaces, with a maximum capacity of 0.41 tons metal per hour per furnace, using a baghouse for control, and exhausting to stack C12.
- (13) Three (3) permanent molding operations, identified as Yellow Brass Permanent Molding, with a maximum capacity 0.41 tons metal per hour per operation, using a baghouse for control and exhausting to stack C12.
- (14) One (1) dielectric core making operation, identified as Dielectric Core Making, with a maximum capacity of 259 pounds cores per hour, using no controls and exhausting internally.
- (15) Three (3) SO₂ core making operations, identified as SO₂ Core Making, with a maximum capacity of 160 pounds cores per hour per operation, using a wet scrubber for SO₂ control and exhausting to stack C15.

Insignificant Activities:

- (1) One (1) oilsand core making operation, identified as Oilsand Core Making, with a maximum capacity of 50 pounds cores per hour, using no controls and exhausting internally.
- (2) One (1) electric induction holding furnace, identified as Red Brass Holding Furnace, with a maximum capacity of 3.13 tons metal per hour, using a baghouse for control and exhausting to stack C8.
- (3) One (1) core knockout operation, identified as Yellow Brass Knockout, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.
- (4) One (1) polishing and buffing operation, identified as Yellow Brass Polishing and Buffing, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.
- (5) One (1) shell core making operation, identified as Shell Core Making, with a maximum capacity of 500 pounds of cores per hour, using no controls and exhausting to the atmosphere.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the above facilities shall not exceed the following pounds per hour when operating at the stated process weight rate.

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

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

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

Facility	Process Weight Rate (tons/hr)	Allowable Emission Rate (lbs/hr)
Charge Handling	3.13	8.81
Red Brass Furnaces	3.13	8.81
Mold Sand Handling	45.28	43.65
Red Brass Pouring	48.41	44.27
Red Brass Cooling	48.41	44.27
Punchout, Shakeout, and Rotating Drum	48.41	44.27
Shotblast 1, Shotblast 2, and Shotblast 3	4.36	10.99
Grinding	4.36	10.99
Sand Reclaiming System	1.00	4.10
Brass Reclaiming System	0.01	0.551
Charge Handling	0.82	3.58
Yellow Brass Furnaces	1.23	4.70
Yellow Brass Permanent Molding	1.23	4.70
SO ₂ Core Making	0.24	1.58
Oil Sand Core Making	0.03	0.55
Red Brass Holding Furnace	3.13	8.81
Yellow Brass Polishing and Buffing	1.23	4.70
Dielectric Coremaking	0.13	1.04

- (b) The allowable PM emission rate from the entire source shall not exceed the 57 pounds per hour. This limitation is equivalent to potential to emit Particulate Matter (PM) less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) will not be applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Visible Emissions Notations

- (a) Daily visible emission notations of the facilities (listed in Section D.1.1) stack exhausts shall be performed during normal daylight operations when exhausting 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses controlling these facilities, at least once weekly when the Red Brass and Yellow Brass Furnaces, Red Brass Holding Furnace, Punchout, Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Polishing and Buffing, Mold Sand Handling and Sand Reclaiming facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 to 6.0 inches of water for the Red Brass Furnaces, Red Brass Holding Furnace, Punchout, Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Buffing, Mold Sand Handling and Sand Reclaiming facilities, 2.0 to 6.0 inches of water for the Yellow Brass Furnace and 3.0 to 7.5 inches of water for the Yellow Brass Polishing facility or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every year and quality assurance verifications shall be performed semi-annually to ensure that the pressure gauge is operating properly.

D.1.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4 the Permittee shall maintain records of daily visible emission notations of the stack exhaust from the facilities listed in Section D.1.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (16) One (1) decorative chrome plating operation, identified as Decorative Chromium Plating, with a maximum capacity of 1,700 amp-hour per hour, using fume suppressant for control and exhausting through stack C16.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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

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

This facility is subject to 40 CFR Part 63, Subpart N, which is incorporated by reference as 326 IAC 20-8-1. A copy of this rule is attached.

- (a) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the decorative chrome plating operation by not allowing the surface tension of the electroplating bath contained within each tank to exceed forty-five (45) dynes per centimeter (dynes/cm) (3.1×10^{-3} pound-force per foot [lbf/ft]) at any time during operation of the tanks.

Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4×10^{-6} gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.

- (b) The following work practice standards for the tanks are also applicable:

- (1) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, fume suppressant, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.2.4.
- (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.2.4.
- (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures and records; and inspection of the source.
- (4) Based on the results of the determination made under Condition D.2.2(b)(3) above, IDEM, OAM may require that the Permittee make changes to the OMP. Revisions may be required if IDEM, OAM finds that the plan:

- (A) Does not address a malfunction that has occurred;

- (B) Fails to provide for the operation of the tanks, air pollution control techniques (i.e., fume suppressant), or 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.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for the one (1) decorative chrome plating operation.

D.2.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

- (a) An Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3), shall be prepared and implemented no later than the compliance date. The OMP shall specify the operation and maintenance criteria for one (1) decorative chrome plating operation, fume suppressant, and monitoring equipment, and shall include the following elements:
 - (1) Manufacturers recommendations for maintenance of the stalagmometer;
 - (2) A standardized checklist to document the operation and maintenance criteria for the tanks, fume suppressant, and monitoring equipment;
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
 - (4) A systematic procedure for identifying malfunctions of the tanks, fume suppressant, and monitoring equipment; and for implementing corrective actions to address such malfunctions;
- (b) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs.
- (c) Recordkeeping associated with the OMP is identified in Condition D.2.7. Reporting associated with the OMP is identified in Condition D.2.8.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63.344]

The Permittee is not required to test this facility by this permit. However, IDEM, OAM 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 emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with the provisions of 40 CFR 63.344.

D.2.6 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343 (c)(5) & (7)]

The Permittee shall monitor the surface tension of the electroplating baths. Operation of either tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. The surface tension of each tank in operation shall be monitored according to the following schedule:

- (a) The surface tension shall be measured once every four (4) hours for the first forty (40) hours of operating time with a stalagmometer or a tensionmeter as specified in 40 CFR 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 operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM until an exceedance occurs.

The source agrees to conduct surface tension measurements, at a minimum, once every four (4) days of operation provided there are no more than forty (40) hours of operating time 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.2.6(b) above.
- (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.2.6(b) above.
- (e) Operating time for chromium electroplating 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 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements [40 CFR 63.346]

- (a) The Permittee shall maintain records to document compliance with Conditions D.2.2 and D.2.4 using the forms provided with this permit. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping Requirements" of this permit, be kept for a period of five (5) years, and include a minimum of the following:
 - (1) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard, i.e., surface tension of the bath in each tank, including the date and time the data are collected.
 - (2) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs.
 - (3) The total process operating time of each tank, not both combined, during the reporting period.

- (4) Records of the date and time that fume suppressants are added to the electroplating bath(s).
- (5) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.2.8.
- (b) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of the tanks or until the tanks are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

D.2.8 Reporting Requirements [40 CFR 63.345 & 63.347]

- (a) In accordance with 40 CFR 63.345, a notification must be submitted to IDEM, OAM prior to any change, modification, or reconstruction of the facility (including conducting electroplating operations that fall under the definition of hard chromium electroplating) or construction of a new facility or source. Notification shall be submitted as soon as practicable, but at least thirty (30) days before the date construction or reconstruction commences.
- (b) In accordance with 40 CFR 63.347(c)(2), a notification of the date when construction or reconstruction was commenced shall be submitted to IDEM, OAM no later than thirty (30) calendar days after such date. In addition, a notification of the actual date of startup of the new or reconstructed facility or source shall be submitted to IDEM, OAM within thirty (30) calendar days after such date. Additional notifications required under 40 CFR 63.345 and 63.347 shall be specified as they become due.
- (c) The Permittee shall notify IDEM, OAM in writing of their intention to conduct a performance test at least sixty (60) calendar days before the test is scheduled to begin. Reports of performance test results shall be submitted no later than forty-five (45) days following the completion of the performance test, and shall be submitted as part of a notification of compliance status as described in 40 CFR 63.347(e), to the address listed in the Section C condition entitled "Performance Testing" of this permit.
- (d) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the OMP required in Condition D.2.4, 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 OMP. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.
- (e) The Permittee shall submit a summary report to document the ongoing compliance status of the facility using the Ongoing Compliance Status Report form provided with this permit. The report shall contain the information specified in 40 CFR 63.347(g)(3) that is applicable.
 - (1) This report shall be submitted annually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty (30) days after the end of each reporting period, which ends December 31.

- (2) If the monitoring data collected by the Permittee in accordance with Condition D.2.6 show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(17) One (1) natural gas fired boiler, identified as B-1, maximum heat input rate of 16.4 million British thermal units per hour (mmBtu/hr), using no controls and exhausting to stack S-1.

Insignificant Activities:

(1) Two (2) natural gas fired boilers, identified as Boiler B-2 and B-3, maximum heat input rate of 4.1 million British thermal units per hour (mmBtu/hr) and 8.2 million British thermal units per hour (mmBtu/hr), respectively, using no controls and exhausting to stacks S-2 and S-3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

- (a) The PM from the 4.1 million British thermal units per hour boiler shall not exceed 0.8 pounds per million British thermal units of heat input.
- (b) The PM from the 8.2 million British thermal units per hour boiler shall not exceed 0.8 pounds per million British thermal units of heat input.
- (c) The PM from the 16.4 million British thermal units per hour boiler shall not exceed 0.62 pounds per million British thermal units of heat input.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

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 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 - Performance Testing.

Record Keeping and Reporting Requirements

D.3.3 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the 16.4 million British thermal units per hour (mmBtu/hr) boiler.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description 326 IAC 2-7-5(15)
Insignificant Activity:
(1) Cleaners and solvents characterized by having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100E F).

Emission Limitations and Standards

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Globe Valve Division of Gerber Plumbing Fixtures Corporation
Source Address: 1514 West Washington, Delphi, IN 46923
Mailing Address: P.O. Box 278, Delphi, IN 46923
Part 70 Permit No.: T015-7521-00011

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**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Globe Valve Division of Gerber Fixtures Corporation
Source Address: 1514 West Washington, Delphi, IN 46923
Mailing Address: P.O. Box 278, Delphi, IN 46923
Part 70 Permit No.: T015-7521-00011

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) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The 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**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Globe Valve Division of Gerber Plumbing Fixtures Corporation
Source Address: 1514 West Washington, Delphi, IN 46923
Mailing Address: P.O. Box 278, Delphi, IN 46923
Part 70 Permit No.: T015-7521-00011

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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**

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

Source Name: Globe Valve Division of Gerber Plumbing Fixtures Corporation
 Source Address: 1514 West Washington, Delphi, IN 46923
 Mailing Address: P.O. Box 278, Delphi, IN 46923
 Part 70 Permit No.: T015-7521-00011

Tank ID #: _____
 Type of process: Decorative
 Monitoring Parameter: Surface tension of the electroplating bath
 Parameter Value: 45 dynes per centimeter
 Limits: Total chromium concentration may not exceed 0.01 mg/dscm

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

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

This form consists of 2 pages

Page 1 of 2

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

MAJOR AND AREA SOURCES: CHECK ONE	
9	NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
9	THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

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

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

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Globe Valve Division of Gerber Plumbing Fixtures Corporation
Source Address: 1514 West Washington, Delphi, IN 46923
Mailing Address: P.O. Box 278, Delphi, IN 46923
Part 70 Permit No.: T015-7521-00011

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. 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.

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Globe Valve Division of Gerber Plumbing Fixtures Corporation
Source Location: 1514 West Washington, Delphi, IN 46923
County: Carroll
SIC Code: 3432, 3471
Operation Permit No.: T015-7521-00011
Permit Reviewer: J. Patterson

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Globe Valve Corporation relating to the operation of a brass foundry.

Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) charge handling process, identified as Charge Handling, with a maximum capacity of 3.13 tons metal per hour, with no controls and exhausting internally.
- (2) Three (3) electric induction furnaces, identified as Red Brass Furnaces, with a maximum capacity of 3.13 tons metal per hour, using a baghouse for control and exhausting to stack C8.
- (3) One (1) mold sand handling operation, identified as Mold Sand Handling System, with a maximum capacity of 45.28 tons sand per hour, using two (2) baghouses for control and exhausting to stacks C8 and C13.
- (4) One (1) pouring operation, identified as Red Brass Pouring, with a maximum capacity of 3.13 tons metal per hour and 45.28 tons sand per hour, using a baghouse for control, and exhausting to stack C8.
- (5) One (1) cooling operation, identified as Red Brass Cooling, with a maximum capacity of 3.13 tons metal per hour and 45.28 tons sand per hour, with no controls, and exhausting internally.
- (6) One (1) punchout, shakeout, and drum shakeout operation, in series, identified as Punchout, Shakeout, and Rotating Drum, with a maximum capacity of 3.13 tons metal per hour and 45.28 sand per hour, using a baghouse for control and exhausting to stack C13.
- (7) One (1) shotblasting operation utilized by Red and Yellow Brass operations, identified as Shotblast 1 and Shotblast 2, with a maximum capacity of 3.95 tons metal per hour, using a baghouse for control and exhausting to stack C10.
- (8) One (1) grinding operation utilized by Red and Yellow Brass operations, identified as Grinding, with a maximum capacity of 3.95 tons metal per hour, using a baghouse for control, and exhausting to stack C4.

- (9) One (1) sand reclaiming operation, identified as Sand Reclaiming System, with a maximum capacity of 1.0 tons sand per hour, using a baghouse for control and exhausting to stack C11.
- (10) One (1) brass reclaiming operation, identified as Brass Reclaiming System, with a maximum capacity of 0.01 ton metal per hour, using a baghouse for control, and exhausting to stack C9.
- (11) One (1) charge handling operations, identified as Charge Handling, with a maximum capacity of 0.41 tons metal per hour per line, using no controls and exhausting internally.
- (12) Two (2) electric induction furnaces, identified as Yellow Brass Furnaces, with a maximum capacity of 0.41 tons metal per hour per furnace, using a baghouse for control, and exhausting to stack C12.
- (13) Two (2) permanent molding operations, identified as Yellow Brass Permanent Molding, with a maximum capacity 0.41 tons metal per hour per operation, using a baghouse for control and exhausting to stack C12.
- (14) One (1) dielectric core making operation, identified as Dielectric Core Making, with a maximum capacity of 259 pounds cores per hour, using no controls and exhausting internally.
- (15) Three (3) SO₂ core making operations, identified as SO₂ Core Making, with a maximum capacity of 160 pounds cores per hour per operation, using a wet scrubber for SO₂ control and exhausting to stack C15.
- (16) One (1) decorative chrome plating operation, identified as Decorative Chromium Plating, with a maximum capacity of 1,700 amp-hour per hour, using fume suppressant for control and exhausting through stack C16.
- (17) One (1) natural gas fired boiler, identified as B-1, maximum heat input rate of 16.4 million British thermal units per hour (mmBtu/hr), using no controls and exhausting to stack S-1.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

The application includes information relating to the construction and operation of the following equipment:

- (1) One (1) charge handling operations, identified as Charge Handling, with a maximum capacity of 0.41 tons metal per hour per line, using no controls and exhausting internally.
- (2) One (1) electric induction furnaces, identified as Yellow Brass Furnaces, with a maximum capacity of 0.41 tons metal per hour, using a baghouse for control, and exhausting to stack C12.
- (3) One (1) permanent molding operations, identified as Yellow Brass Permanent Molding, with a maximum capacity 0.41 tons metal per hour, using a baghouse for control and exhausting to stack C12.

- (4) One (1) shotblasting operation utilized by Red and Yellow Brass operations, identified as Shotblast 3, with a maximum capacity of 1.23 tons metal per hour, using a baghouse for control and exhausting to stack C10.
- (5) One (1) grinding operation, identified as Grinding, with a maximum capacity of 0.41 tons metal per hour, using a baghouse for control, and exhausting to stack C4.

Insignificant Activities

The source also consists of 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 million (10,000,000) Btu/hour.
- (2) Combustion source with flame safety purging on startup.
- (3) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (4) Refractory storage not requiring air pollution control equipment.
- (5) Cleaners and solvents characterized by having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100E F).
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
- (7) Infrared cure equipment.
- (8) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (9) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (10) A noncontact, forced and induced draft cooling tower system not regulated under a NESHAP.
- (11) Quenching operations used with heat treating processes.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (13) Equipment used to collect any material that might be released during a malfunction, process upset or spill clean-up, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (14) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling tower.
- (15) Diesel generators not exceeding 1600 horsepower.
- (16) Stationary fire pumps.
- (17) Purge double block and bleed valves.

- (18) Filter or coalescer media changeout.
- (19) A laboratory as defined in 326 IAC 2-7-1(21).
- (20) Gluing operations.
- (21) One (1) oilsand core making operation, identified as Oilsand Core Making, with a maximum capacity of 50 pounds cores per hour, using no controls and exhausting internally.
- (22) One (1) electric induction holding furnace, identified as Red Brass Holding Furnace, with a maximum capacity of 3.13 tons metal per hour, using a baghouse for control and exhausting to stack C8.
- (23) One (1) core knockout operation, identified as Yellow Brass Knockout, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.
- (24) One (1) polishing and buffing operation, identified as Yellow Brass Polishing and Buffing, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.
- (25) One (1) shell core making operation, identified as Shell Core Making, with a maximum capacity of 500 pounds of cores per hour, using no controls and exhausting to the atmosphere.
- (26) Two (2) natural gas fired boilers, identified as Boiler B-2 and B-3, maximum heat input rate of 4.1 million British thermal units per hour (mmBtu/hr) and 8.2 million British thermal units per hour (mmBtu/hr), respectively, using no controls and exhausting to stacks S-2 and S-3.
- (27) Core wash, release agent, and parting fluid usage, identified as Core Wash, with a maximum use of 0.2 pounds of VOC per hour, using no controls and exhausting internally.
- (28) One (1) natural gas fired drying oven, identified as Drying Oven, associated with the yellow brass lines, with a maximum heat input of 3.0 million British thermal units per hour (mmBtu/hr), using no controls and exhausting internally.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) CP 08-02-91-0094, issued on June 30, 1987.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:
 Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996.

A notice of completeness letter was mailed to the source on January 17, 1997.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
Lead	greater than 10
Nickel	greater than 10
Methylene Chloride	less than 10
Chromium	less than 10
Antimony	less than 10
Phosphorus	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of particulate matter are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Because furnaces from which molten brass or bronze are cast into the shape of finished products are not considered affected facilities by the New Source Performance Standard, 40 CFR 60.130, Subpart M and, thus, not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	19.65
PM-10	15.06
SO ₂	0
VOC	.002
CO	.018
NO _x	0
HAP * Lead	0.77
Antimony	.01
Nickel	.29
Phosphorus	.0008
Manganese	.0002
Methylene Chloride	.17
Chromium	.11

*HAPs data from the Title V application submitted by the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Charge Handling	12.35	7.41					
Red Brass Furnace	3.02	3.02					
Mold Sand Handling	1.72	1.43					
Red Brass Pouring	0.42	0.42					
Red Brass Cooling	19.19	19.19					
Punchout, Shakeout, and Rotating Drum	0.53	0.37					
Shotblast 1, 2, and 3	23.46	10.56					
Grinding	0.66	0.07					
Sand Reclaiming	15.32	12.7					
Brass Reclaiming	0.05	0.05					

Yellow Brass Furnaces	1.785	1.785					
Yellow Brass Permanent Molding	0.37	0.31					
SO2 Core Making	0.23	0.19					
Oil Sand Core Making	0.07	0.06					
Red Brass Holding Furnace	3.02	3.02					
Yellow Brass Polishing and Buffing	18.80	8.46					
Boiler	1.0	1.0				10.1	
Total Emissions	101.99	70.05				10.1	

The values in the table are the potential emissions after controls.

County Attainment Status

The source is located in Carroll County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	attainment
NO ₂	attainment
Ozone	unclassifiable/attainment
CO	unclassifiable/attainment
Lead	not designated

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Carroll County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.130, Subpart M), because furnaces from which molten brass or bronze are cast into the shape of finished products are not considered affected facilities by this rule.
- (b) The 16.4 MMBtu/hr natural gas-fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc), because construction commenced prior to June 9, 1989.
- (c) The chromium electroplating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:

- (1) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the decorative chrome plating operation by not allowing the surface tension of the electroplating bath contained within each tank to exceed forty-five (45) dynes per centimeter (dynes/cm) (3.1×10^{-3} pound-force per foot [lbf/ft]) at any time during operation of the tanks.

Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4×10^{-6} gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.

- (2) The following work practice standards for the tanks are also applicable:
 - (A) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, fume suppressant, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP).
 - (B) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP.
 - (C) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures and records; and inspection of the source.
 - (D) Based on the results of the determination made under (2)(C) above, IDEM, OAM may require that the Permittee make changes to the OMP. Revisions may be required if IDEM, OAM finds that the plan:
 - (i) Does not address a malfunction that has occurred;
 - (ii) Fails to provide for the operation of the tanks, air pollution control techniques (i.e., fume suppressant), or process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
 - (iii) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
 - (E) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

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

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

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 12, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major stationary source because emissions of criteria pollutants are less than 250 tons per year and because furnaces from which molten brass or bronze are cast into the shape of finished products are not considered affected facilities by the New Source Performance Standard, 40 CFR 60.130, Subpart M and, thus, not one of the twenty-eight (28) listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of particulate matter. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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 forty percent (40%) 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.

State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 16.4 MMBtu/hr natural gas fired boiler is subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-3(d):

- (a) The PM from the 4.1 million British thermal units per hour boiler shall not exceed 0.8 pounds per million British thermal units of heat input.
- (b) The PM from the 8.2 million British thermal units per hour boiler shall not exceed 0.8 pounds per million British thermal units of heat input.
- (c) The PM from the 16.4 million British thermal units per hour boiler shall not exceed 0.62 pounds per million British thermal units of heat input.

This limit is the maximum allowed and it is less than the limit as derived by the following formula pursuant to 326 IAC 6-2-3(b).

$$P_t = (C * a * h) / (76.5 * Q^{0.75} * N^{0.25})$$

where: P_t - PM limit in pounds per MMBtu
C - Maximum ground level concentration, 50 ug/m³
a - Plume rise factor, 0.67
h - Stack height in feet
Q - total source permitted capacity in MMBtu/hr
N - Number of stacks

therefore,

(a) For the 4.1 mmBtu/hr boiler constructed in 1950:

$$P_t = (50 * 0.67 * 25) / (76.5 * (4.1)^{0.75} * (1)^{0.25})$$

$$P_t = 3.79 \text{ lbs/MMBtu}$$

Particulate matter emissions from the boiler are based on an emission factor of 12.0 lbs/MMCF of gas burned. Based on the assumption that 1 MMCF of gas combusted is equivalent to 1000 MMBtu of heat input, the potential emissions from the 4.1 MMBtu/hr boiler are expected to be 0.012 lbs/MMBtu. Therefore, the boiler is capable of complying with this rule when combusting natural gas. This limit will not be reflected in the permit because it is assumed that natural gas combustion will always comply with this rule.

(b) For the 8.2 mmBtu/hr boiler constructed in 1959:

$$P_t = (50 * 0.67 * 20.33) / (76.5 * (12.3)^{0.75} * (2)^{0.25})$$

$$P_t = 1.139 \text{ lbs/MMBtu}$$

Particulate matter emissions from the boiler are based on an emission factor of 12.0 lbs/MMCF of gas burned. Based on the assumption that 1 MMCF of gas combusted is equivalent to 1000 MMBtu of heat input, the potential emissions from the 8.2 MMBtu/hr boiler are expected to be 0.012 lbs/MMBtu. Therefore, the boiler is capable of complying with this rule when combusting natural gas. This limit will not be reflected in the permit because it is assumed that natural gas combustion will always comply with this rule.

(c) For the 16.4 mmBtu/hr boiler constructed in 1950:

$$P_t = (50 * 0.67 * 23.15) / (76.5 * (28.7)^{0.75} * (3)^{0.25})$$

$$P_t = 0.6212 \text{ lbs/MMBtu}$$

Particulate matter emissions from the boiler are based on an emission factor of 13.7 lbs/MMCF of gas burned. Based on the assumption that 1 MMCF of gas combusted is equivalent to 1000 MMBtu of heat input, the potential emissions from the 16.4 MMBtu/hr boiler are expected to be 0.014 lbs/MMBtu. Therefore, the boiler is capable of complying with this rule when combusting natural gas. This limit will not be reflected in the permit because it is assumed that natural gas combustion will always comply with this rule.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the foundry operations shall 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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The PM limits for each operation are as follows:

Facility	Process Weight (tons per hour)	Allowable PM Emission Rate (pounds per hour)	Potential PM Emission Rate After Controls (pounds per hour)
Charge Handling	3.95	12.39	2.82
Red Brass Furnace	3.13	8.81	0.69
Mold Sand Handling	45.28	43.65	0.39
Red Brass Pouring	48.41	44.27	0.10
Red Brass Cooling	48.41	44.27	4.38
Punchout, Shakeout and Rotating Drum	48.41	44.27	0.12
Shotblast 1, 2, and 3	4.36	10.99	5.36
Grinding	4.36	10.99	0.15
Sand Reclaiming	1.00	4.10	3.49
Brass Reclaiming	0.01	0.18	0.01
Yellow Brass Furnace	1.23	4.70	0.41
Yellow Brass Permanent Molding	1.23	4.70	0.084
SO2 Core Making	0.08	0.75	0.12
Oil Sand Core Making	0.03	0.55	0.02
Red Brass Holding Furnace	3.13	8.81	0.69
Yellow Brass Polishing and Buffing	1.23	4.70	4.29

As shown in the above table, all facilities comply with the requirements of this rule. In order to comply with these limits, the baghouses shall be in operation at all times when the following facilities are in operation: Red Brass Furnaces, Red Brass holding furnace, Yellow Brass furnace, Punchout, Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Polishing and Buffing, Mold sand handling and Sand Reclaiming.

326 IAC 7-1 Sulfur Dioxide Emission Limitations

Pursuant to 326 IAC 7-1, the SO₂ Core Making facility is subject to this rule. However, the SO₂ emission limitations and standards referenced in 326 IAC 7-1 relate to fuel combustion activities. Therefore, the SO₂ Core Making facility has no SO₂ applicable requirements.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The Charge Handling, Red Brass Pouring, Red Brass Cooling, Grinding and Brass Reclaiming facilities have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations from the exhaust of each facility shall be performed during normal daylight operations. 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.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The Red Brass and Yellow Brass Furnaces, Red Brass Holding Furnace, Punchout Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Polishing and Buffing, Mold Sand Handling and Sand Reclaiming facilities have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations from the exhaust of each facility shall be performed during normal daylight operations. 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) The Permittee shall record the total static pressure drop across the baghouses controlling these facilities, at least once weekly when the Red Brass and Yellow Brass Furnaces, Red Brass Holding Furnace, Punchout, Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Polishing and Buffing, Mold Sand Handling and Sand Reclaiming facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 to 6.0 inches of water for the Red Brass Furnaces, Red Brass Holding Furnace, Punchout, Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Buffing, Mold Sand Handling and Sand Reclaiming facilities, 2.0 to 6.0 inches of water for the Yellow Brass Furnace and 3.0 to 7.5 inches of water for the Yellow Brass Polishing facility or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for these facilities must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (3) The chromium plating operations have applicable compliance monitoring conditions as specified below:
 - (a) The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
 - (b) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.

- (c) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.
- (d) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

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

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

These monitoring conditions are necessary to show compliance with 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) 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) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) Since this source has no new construction or reconstruction, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply.

Conclusion

The operation of this brass foundry shall be subject to the conditions of the attached proposed **Part 70 Permit No. T015-7521-00011**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name: Globe Valve Division of Gerber Plumbing Fixtures Corporation
Source Location: 1514 West Washington, Delphi, Indiana 46923
County: Carroll
SIC Code: 3432, 3471
Operation Permit No.: T015-7521-00011
Permit Reviewer: J. Patterson / Catherine Moore

On October 28, 1998, the Office of Air Management (OAM) had a notice published in the Carroll County Comet, Flora, Indiana, stating that Globe Valve Division of Gerber Plumbing Fixtures Corporation had applied for a Part 70 Operating Permit to operate a brass foundry. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 18, 1998, George Richey of Globe Valve Division of Gerber Plumbing Fixtures Corporation submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

Condition A.3, Specifically Regulated Insignificant Activities

We do not believe that all of the insignificant activities indicated have applicable regulations. It appears that the insignificant activities list in the TSD has simply been copied to this section. The following list indicates the activities that we believe could have applicable regulations, and the regulation in question. We have used the numbering from the permit. We request that all other insignificant activities that are indicated in the permit be removed.

- a. No. 26: fuel combustion particulate limits (326 IAC 6-2-3)
- b. No. 5: cold cleaner degreasing (326 IAC 8-3-2)
- c. Nos. 6, 21, 22, 23, 24, and 25: particulate emissions for process operations (326 IAC 6-3-2(c))

Response to Comment 1:

1. Condition A.3 "Specifically Regulated Insignificant Activities" has been changed to be as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
~~[326 IAC 2-7-5(15)]~~

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

- ~~(1) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu/hour.~~
- ~~(2) Combustion source with flame safety purging on startup.~~

- ~~(3) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.~~
- ~~(4) Refractory storage not requiring air pollution control equipment.~~
- ~~(5)(1) Cleaners and solvents characterized by having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100E F).~~
- ~~(6)(2) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.~~
- ~~(7) Infrared cure equipment.~~
- ~~(8) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.~~
- ~~(9) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.~~
- ~~(10) A noncontact, forced and induced draft cooling tower system not regulated under a NESHAP.~~
- ~~(11) Quenching operations used with heat treating processes.~~
- ~~(12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.~~
- ~~(13) Equipment used to collect any material that might be released during a malfunction, process upset or spill clean up, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.~~
- ~~(14) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling tower.~~
- ~~(15) Diesel generators not exceeding 1600 horsepower.~~
- ~~(16) Stationary fire pumps.~~
- ~~(17) Purge double block and bleed valves.~~
- ~~(18) Filter or coalescer media changeout.~~
- ~~(19) A laboratory as defined in 326 IAC 2-7-1(21).~~
- ~~(20) Gluing operations.~~
- (21)(3) One (1) oilsand core making operation, identified as Oilsand Core Making, with a maximum capacity of 50 pounds cores per hour, using no controls and exhausting internally.**
- (22)(4) One (1) electric induction holding furnace, identified as Red Brass Holding Furnace, with a maximum capacity of 3.13 tons metal per hour, using a baghouse for control and exhausting to stack C8.**
- (23)(5) One (1) core knockout operation, identified as Yellow Brass Knockout, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.**

- ~~(24)~~(6) One (1) polishing and buffing operation, identified as Yellow Brass Polishing and Buffing, with a maximum capacity of 1.23 tons metal per hour, using no controls and exhausting internally.
- ~~(25)~~(7) One (1) shell core making operation, identified as Shell Core Making, with a maximum capacity of 500 pounds of cores per hour, using no controls and exhausting to the atmosphere.
- ~~(26)~~(8) Two (2) natural gas fired boilers, identified as Boiler B-2 and B-3, maximum heat input rate of 4.1 million British thermal units per hour (mmBtu/hr) and 8.2 million British thermal units per hour (mmBtu/hr), respectively, using no controls and exhausting to stacks S-2 and S-3.
2. Section D.4 "FACILITY OPERATION CONDITIONS" has been added to the final permit as follows to list the requirements for the cold cleaner degreasing operations:

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description 326 IAC 2-7-5(15)

Insignificant Activity:

- (1) Cleaners and solvents characterized by having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100E F).**

Emission Limitations and Standards

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

Comment 2:

Condition B.10(a), Certification

The condition as written is overly broad. We would recommend that the following phrase be added to the beginning of the condition. "Where specifically designated by this permit or required by an applicable requirement, application forms, reports, ..."

Response to Comment 2:

Condition B.10(a) "Certification" has been changed to be as follows:

- (a) **Where specifically designated by this permit or required by an applicable requirement, 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.**

Comment 3:

Condition B.28, Credible Evidence, the condition should be eliminated from the permit because it is beyond the State's authority.

Response to Comment 3:

IDEM, OAM now believes that this condition is not necessary and has removed it from the final permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. Condition B.28 "Credible Evidence" has been deleted from the final permit as follows:

~~B.28 Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.~~

Comment 4:

Condition C.17, Compliance Monitoring Plan

We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We request that all references to a Compliance Response Plan be eliminated from this condition. If it is not possible to remove references to Compliance Response Plan, we wish to request that the condition be worded such that failure to take specific response steps would not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement.

Response to Comment 4:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Part 70 permit program.

The regulatory authority for and the essential elements of a compliance monitoring plant were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comment sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading. Some of the terminology has changed, as a result of the comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Comment 5:

Condition D.1.1(a), Particulate Matter

- a. The allowable emission rate limit for the Brass Reclaiming System should be 0.551 lbs/hr particulate matter, not 0.18 lbs/hr. IDEM has set a lower threshold at 0.551 lbs/hr for process operations with less than 100 lbs/hr of material throughput.
- b. The core sand processing rate for SO₂ coremaking is 0.08 tons/hr/machine for three machines (160 lbs/hr for each machine), not 0.08 tons/hr for all three machines. The sand for these machines is handled and fed simultaneously by one piece of equipment. The allowable particulate emission limit should therefore be 1.58 lbs/hr, based on 0.24 tons/hr throughput.
- c. Dielectric coremaking was omitted from the 326 IAC 6-3 list. The process rate is 259 lbs/hr core sand, resulting in a 1.04 allowable emission limit.

Response to Comment 5:

Condition D.1.1(a) "Particulate Matter" has been changed to be as follows:

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the above facilities shall not exceed the following pounds per hour when operating at the stated process weight rate.

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

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

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

Facility	Process Weight Rate (tons/hr)	Allowable Emission Rate (lbs/hr)
Charge Handling	3.13	8.81
Red Brass Furnaces	3.13	8.81
Mold Sand Handling	45.28	43.65
Red Brass Pouring	48.41	44.27
Red Brass Cooling	48.41	44.27
Punchout, Shakeout, and Rotating Drum	48.41	44.27
Shotblast 1, Shotblast 2, and Shotblast 3	4.36	10.99
Grinding	4.36	10.99
Sand Reclaiming System	1.00	4.10
Brass Reclaiming System	0.01	0.18 0.551
Charge Handling	0.82	3.58
Yellow Brass Furnaces	1.23	4.70
Yellow Brass Permanent Molding	1.23	4.70
SO ₂ Core Making	0.08 0.24	0.75 1.58
Oil Sand Core Making	0.03	0.55
Red Brass Holding Furnace	3.13	8.81
Yellow Brass Polishing and Buffing	1.23	4.70
Dielectric Coremaking	0.13	1.04

Comment 6:

Condition D.1.4, Visible Emissions Notations

We believe that for a clean operation such as ours, daily VE notations are excessive. On a day to day basis, our production and associated emissions are relatively consistent and does not suffer from radical changes. After many years of observing the workings and emissions from this foundry operation, we do not believe that daily VE notations would provide any information beyond that which weekly VE notations would provide. Also, our aggressive maintenance standards have resulted in very reliable particulate control equipment operation.

Although some exhaust points are visible to employees that must occasionally move about the facility grounds to complete their responsibilities, the locations of these exhausts do not allow observations from only one or two positions. Therefore, VE notations would have to be taken from multiple locations, representing a considerable time contribution from the individual with this responsibility. Given the current business environment, we maintain as small a work force as possible and do not have many personnel who could be given this responsibility. A weekly observation cycle would represent an acceptable interval, both from a compliance and personnel standpoint. We request that our monitoring frequency be adjusted to require weekly visible emissions notations.

In addition, many of our stacks can only be seen from the roof of our building. We are concerned that our staff may be required to access the roof during periods of poor weather when personal safety is an issue. We wish to request that the following statement be added to the visible emissions notations conditions: "During periods of inclement weather, visible emissions notations will be performed weather permitting."

Response to Comment 6:

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. Access to the roof is not necessary to record visible emissions. An observer does not have to be able to see the stack. They are required to look at the exhaust coming from the stack. These observations can be made from any reasonable location. Abnormal visible emissions that are observed would then be the basis for further action. The Office of Air Management feels that if visible emissions were only verified once a week, once per month, or once per quarter, the possibility for a malfunction of the control equipment would not be detected soon enough and would lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 7:

Condition D.1.5, Parametric Monitoring

We have not seen evidence that semi-annual pressure gauge calibration is necessary and believe that annual calibration would be more than adequate. We have provided a letter from Dwyer, our gauge supplier, stating that an annual calibration frequency is recommended. Dwyer recommends a semiannual calibration frequency for critical applications, such as nuclear power plants. We request that our permit indicate an annual calibration frequency.

Response to Comment 7:

IDEM, OAM feels that rather than doing semi-annual pressure gauge calibration, the Permittee may do annual calibration and semi-annual quality assurance verifications. Condition D.1.5 "Parametric Monitoring" has been changed to be as follows:

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses controlling these facilities, at least once weekly when the Red Brass and Yellow Brass Furnaces, Red Brass Holding Furnace, Punchout, Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Polishing and Buffing, Mold Sand Handling and Sand Reclaiming facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 to 6.0 inches of water for the Red Brass Furnaces, Red Brass Holding Furnace, Punchout, Shakeout and Rotating Drum, Shotblast 1, 2, and 3, Yellow Brass Buffing, Mold Sand Handling and Sand

Reclaiming facilities, 2.0 to 6.0 inches of water for the Yellow Brass Furnace and 3.0 to 7.5 inches of water for the Yellow Brass Polishing facility or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every ~~six (6) months~~ **year and quality assurance verifications shall be performed semi-annually to ensure that the pressure gauge is operating properly.**

Comment 8:

Condition D.1.6, Broken Bag or Failure Detection

Conditions requiring shut down of control equipment during malfunction conditions are specifically covered by Section B.13 - Emergency Provisions. This source-wide requirement is applicable for all control equipment at our facility.

In addition, condition (a) appears to contradict condition (b). While condition (b) allows us to postpone baghouse repair until a break time or shift change, condition (a) requires us to discontinue operations immediately upon bag failure when the chamber containing the broken bag cannot be isolated and shut down. We request that the requirements of (a) be deleted on the basis that bag failure is covered in emergency provisions. Globe would monitor opacity through visible emissions notations in the event of bag failure to ensure compliance with 326 IAC 5-1.

Response to Comment 8:

Condition D.1.6 "Broken Bag or Failure Detection" has been changed to be as follows:

D.1.6 Broken or Failed Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Comment 9:

Condition D.1.7(b)(1)(B), Record Keeping Requirements

The baghouse cleaning cycles are triggered automatically by a static pressure drop monitor. The setpoints for the monitors are all within the ranges indicated at D.1.5. Because the cleaning cycle frequency is automatic and not predetermined, we cannot maintain a record of frequency and differential pressure during cleaning without assigning someone to watch this continuously. We therefore request that this record keeping requirement be deleted.

Response to Comment 9:

Since the cleaning cycle is automatic, this record keeping requirement can be deleted. Monitoring of the pressure drop across the baghouse will verify that the cleaning cycle is operating properly. Condition D.1.7(b)(1) "Record Keeping Requirements" has been changed to be as follows:

- (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; ~~and~~
 - ~~(B) Cleaning cycle frequency and differential pressure.~~

Comment 10:

Condition D.1.7(b)(3), (4), (5), and (7), Record Keeping Requirements

We are not certain what is specifically required and cannot ensure compliance without clear requirements. We believe that it is likely that these are items that are already contained in our preventive maintenance plans, and Condition B.12 requires that Preventive Maintenance Plans be developed. We are already required to monitor pressure drop and take visible emissions notations under this permit, and believe that these requirements in Condition D.1.7 are duplicative of the requirements of Condition B.12. We therefore request that these recordkeeping requirements be removed.

Response to Comment 10:

IDEM, OAM feels that it would be a good idea to have these requirements as part of the Preventive Maintenance Plan. Therefore, it should not be a problem to maintain these records. There will be no changes this condition in the final permit due to this comment.

Comment 11:

Condition D.1.7(b)(8), Record Keeping Requirements

We do not have vents that can be redirected and request that this recordkeeping requirement be removed.

Response to Comment 11:

Condition D.1.7(b)(8) "Record Keeping Requirements" has been deleted from the final permit as follows:

- ~~(8) Documentation of the dates vents are redirected.~~

Comment 12:

Condition D.2.6(b), Compliance Determination Requirements

This permit requires surface tension measurement on a daily basis. On November 14, 1996, Globe received permission from IDEM to measure the surface tension once on an operating day every four days, provided that no more than 40 hours of operation occur between measurement.

Assuming that the required 4-hour and 8-hour start up measurement intervals have been completed, and that there have been no exceedances, daily measurement exceeds the requirements of NESHAP (40 CFR 63, Subpart N). At 40 CFR 63.343(c)(5)(iii)(B), it is specified that:

“Once there are no exceedances during 40 hours of tank operation, surface tension measurements may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.”

We request that Condition D.2.6 be revised to require measurements once every four days, providing that no more than 40 hours of operation occur between each measurement.

Response to Comment 12:

Condition D.2.6(b) “Monitoring to Demonstrate Continuous Compliance” has been changed to be as follows:

- (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM until an exceedance occurs.

The source agrees to conduct surface tension measurements, at a minimum, once ~~each day~~ **every four (4) days** of operation provided there are no more than forty (40) hours of operating time between successive surface tension measurements.

Comment 13:

Condition D.2.7(a)(5), Record Keeping Requirements

Reports required by Condition D.6.8 are referenced. We believe that this is a typo and request that the condition be revised to reference Condition D.2.8.

Response to Comment 13:

Condition D.2.7(a)(5) “Record Keeping Requirements” has been changed to be as follows:

- (5) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition ~~D.6.8~~ **D.2.8**.

Comment 14:

Condition D.2.8(e)(1), Record Keeping Requirements

Semiannual report submittal is required under Subpart N for major HAP sources. We believe that we are an area HAP source and have included justification as an attachment to these comments. An area HAP source is required by Subpart N to prepare an annual summary report to document the compliance status of the source. Our inspector, Mr. David Rice, requested in a January 29, 1997, letter that we maintain an annual report on site relative to our decorative chrome electroplating operations. We have historically met our surface tension requirements in order to comply with Subpart N. We request that our permit require us to maintain an annual compliance summary on site which would be made available to an IDEM representative upon request.

Response to Comment 14:

IDEM, OAM agrees that this change should be made. However, if the source ever becomes a major source of HAPs, the frequency of reporting shall be semi-annually. Condition D.2.8(e)(1) "Reporting Requirements" has been changed to be as follows:

- (1) This report shall be submitted ~~semiannually~~ **annually** on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty (30) days after the end of each reporting period, which ends ~~June 30 and December 31~~ **respectively**.

Comment 15:

Technical Support Document

The "Limited Potential to Emit" table shows PM and PM10 emissions limited at 102 and 70 tons/yr. We do not believe that these values are correct and request that they be revised to correspond to 250 tons/yr synthetic PSD minor limit.

Response to Comment 15:

Potential to Emit is either the actual emissions, the allowable emissions (if required), the potential emissions after control (if applicable), or the potential emissions before control (if no control device). Therefore, each facility has a limited potential to emit based on one of the above factors. The total limited potential to emit is the sum of all the facility's potential to emit. The source may not increase the potential to emit without receiving prior approval from IDEM, OAM. Since the potential to emit is not greater than 250 tons per year, the source is not subject to the requirements of 326 IAC 2-2 (PSD) and therefore would not need a synthetic PSD minor limit. There will be no changes to the final permit due to this comment.

Comment 16:

Technical Support Document, Air Toxic Emissions

Part (b) indicates that 326 IAC 2-1-3.4 does not apply because this source does not have any new construction or reconstruction. As a point of clarification, 326 IAC 2-1-3.4 does not apply because the proposed new Yellow Brass Line is not a new major source of HAP emissions (10 tons/yr single HAP or 25 tons/yr combination of HAPs). The proposed Yellow Brass Line will be new construction. We request that this clarification be reflected in the TSD.

Response to Comment 16:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Upon further review, OAM has made the following changes to the final Part 70 permit:

1. Condition C.2 "Opacity" has been changed to be as follows:

C.2 Opacity [326 IAC 5-1]

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

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

2. Condition D.1.2 "Preventive Maintenance Plan" has been changed to be as follows:

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~the Grinding~~ **these facility facilities** and ~~its~~ **their** control devices.