

ADEQ
DRAFT
MINOR SOURCE
AIR PERMIT

Permit No.: 1415-AR-10

IS ISSUED TO:

Danaher Tool Group
1609 N Old Missouri Road
Springdale, AR 72764
Washington County
AFIN: 72-00455

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
BTU	British Thermal Units
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MMBtu/hr	million BTU per hour
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NPDES	National Pollutant Discharge Elimination System
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns in Diameter
PTE	Potential to Emit
SN	Source Number
SO ₂	Sulfur Dioxide
tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Danaher Tool Group

AFIN: 72-00455

PERMIT NUMBER: 1415-AR-10

FACILITY ADDRESS: 1609 N Old Missouri Road
Springdale, AR 72764

MAILING ADDRESS: 1609 N Old Missouri Road
Springdale, AR 72764

COUNTY: Washington County

CONTACT NAME: Gary Young

CONTACT POSITION: Environmental Technician

TELEPHONE NUMBER: 479-751-8500

REVIEWING ENGINEER: Patty Campbell, PE

UTM North South (Y): Zone 15: 4006567.47 m

UTM East West (X): Zone 15: 399682.40 m

Section II: INTRODUCTION

Summary of Permit Activity

Danaher Tool Group operates a hand and edge tools manufacturing facility (NACIS 332212) located at 1609 N. Old Missouri Road, Springdale, Arkansas 72764. This permitting action is necessary to:

- Correct (increase) the heat rating of the two Boilers (SN-55 and 58), installed in 2006 and 2007, and re-designate the source numbers to SN-18 and 17, respectively; and
- Remove Tin (Sn) from SN-45.

The total permitted annual emission rate limit changes associated with these modifications include: 0.3 tpy PM/PM₁₀, 0.2 tpy VOC, 5.1 tpy CO, 0.8 tpy NO_x, and 0.01 tpy Sn.

Process Description

Wrench forgings are first produced by either cold forming of steel blanks or by forging heated steel rods. Once formed, these wrenches are shot blasted (SN-06) Wheelabrated with steel particles and machined (SN-03 and 04) to produce the desired surface finish and dimensions. These processes produce particulate emissions which are controlled by dust collectors.

Following machining, the wrenches are heat treated in furnaces (SN-26, 27, 28, 29, 30, 31, 32, 36, and 37) to produce the desired strength and hardness. Some of these furnaces are natural gas fired. The wrenches are again wheelabrated (SN-08 and 09) to improve the finish and also may undergo further grinding and polishing (SN-60), or they may be placed in vibratory media to improve the finish. All grinding, polishing and wheelabrated operations are equipped with dust collection devices (SN-56 and 57). There is also a natural gas fired generator (SN-33).

Once the machining and grinding (SN-03, 04, and 60) of the parts are complete, the shaped wrenches are washed and plated with nickel and chrome. Water used in the plating process is heated by steam from two boilers (SN-18 and 17). The wrenches are loaded on racks and submerged in a series of open tanks/baths. These tanks include a hydrochloric acid cleaning bath (SN-23), sulfuric acid bath (SN-22), sodium hydroxide baths (SN-24 and 25), nickel plating bath (SN-21), trivalent chrome (C⁺³) electroplating baths (SN-20 and 47), phosphate plating bath (SN-43) and a nitric acid stripper (SN-46). Evaporation from these tanks is evacuated to the roof and discharged into the air. The nitric acid emissions are controlled by a scrubber.

The barrel plating process (SN-45) consists of a variety of tanks starting with a caustic cleaning wash (SN-42) in sodium hydroxide solution. The wrenches are then rinsed and washed in a sulfuric acid solution. The next operation is plating with semi-bright nickel, bright nickel and tin-nickel. All of these plating processes are accomplished through an electrolytic process. In the final process, the wrenches are dipped in hexavalent chromium (C⁺⁶) bath (SN-45) with no electrolytic action. The wrenches are then rinsed and unloaded. The rinses are heated by current (SN-18 and 17).

Following plating, the wrenches are packed for storage or shipment. The wrench racks are submerged in the nitric acid tank (SN-19) for stripping and reused to plate more wrenches.

Regulations

The following table contains the regulations applicable to this permit.

Source Number	Regulations
Facility	Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Facility	Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009
20 & 47	40 CFR Part 63.340 Subpart N – National Emission Standards for Hazardous Air Pollutants – <i>Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks</i> (Appendix A)
17	40 CFR Part 60 Subpart Dc – New Source Performance Standard (NSPS) – <i>Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units</i> (Appendix A)

This facility has two trivalent decorative chromium electroplating tanks (SN-20 & SN-47) which use a wetting agent to reduce the chromium emissions by reducing the surface tension of the solution. The hexavalent chromium tank (SN-45) is not subject to the *National Emissions Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks* (40 CFR, Part 63, Subpart N), since no current is applied.

Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	4.6	13.9
PM ₁₀	4.6	13.9
SO ₂	1.4	1.4

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TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
VOC	1.5	1.8
CO	2.8	7.9
NO _x	3.0	11.3
Nitric Acid (HNO ₃)	0.19	0.80
Nickel (Ni)	0.29	1.08
Trivalent Chromium (Cr ⁺³)	0.13	0.51
Hexavalent Chromium (Cr ⁺⁶)	0.00003	0.00013
Sulfuric Acid (H ₂ SO ₄)	0.19	0.80
Hydrochloric Acid (HCl)	0.15	0.61
Sodium Hydroxide (NaOH)	0.13	0.49
Phosphoric Acid (H ₃ PO ₄)	0.09	0.36
Nickel Sulfate (NiSO ₄)	0.014	0.07

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Section III: PERMIT HISTORY

Permit No. 1415-AR-1 was issued to Danaher Tool Group on July 7, 1993. The emission limits contained in the permit were: PM₁₀ – 62.6 tpy, SO₂ – 0.3 tpy, VOC – 0.7 tpy, CO – 3.8 tpy, NO_x – 15.7 tpy, HNO₃ – 0.4 tpy, CR⁺³ – 0.4 tpy, Ni – 6.9 tpy, HCl – 3.6 tpy, and NaOH – 1.9 tpy.

Permit No. 1415-AR-2 was issued to Danaher Tool Group on February 28, 1995. The emission limits contained in the permit were: PM – 60.0 tpy, SO₂ – 3.8 tpy, VOC – 4.2 tpy, CO – 7.0 tpy, NO_x – 17.3 tpy.

Permit No. 1415-AR-3 was issued to Danaher Tool Group on September 5, 1996. The emission limits contained in the permit were: PM – 5.4 tpy, SO₂ – 1.4 tpy, VOC – 1.6 tpy, CO – 4.6 tpy, NO_x – 17.2 tpy, HNO₃ – 0.8 tpy, CR⁺³ – 0.4 tpy, CR⁺⁶ – 0.2 tpy, Ni – 7.3 tpy, HCl – 0.7 tpy, NaOH – 0.8 tpy, H₂SO₄ – 1.0 tpy, H₃PO₄ – 0.4, NiSO₄ – 0.1 tpy, and Sn – 0.2 tpy.

Permit No. 1415-AR-4 was issued to Danaher Tool Group on October 27, 2004. This modification included the addition of a second trivalent chrome electroplating process (SN-47), the addition of six new small natural gas fueled sources (SN-48 through SN-53) and a new dust collector (SN-54), which was added to the Insignificant Activities List. The emission limits for several sources were recalculated and the emission limits for all sources were changed to agree with the calculations in the previous permit. Total facility emissions were permitted at: PM/PM₁₀ – 28.6 tpy, SO₂ – 1.4 tpy, VOC – 1.6 tpy, CO – 4.6 tpy, NO_x – 17.2 tpy, HNO₃ – 0.99 tpy, CR⁺³ – 0.50 tpy, CR⁺⁶ – 0.01 tpy, Ni – 1.12 tpy, HCl – 0.61 tpy, NaOH – 0.47 tpy, H₂SO₄ – 0.93 tpy, H₃PO₄ – 0.36, NiSO₄ – 0.07 tpy, and Sn – 0.01 tpy.

Permit No.: 1415-AR-5 was issued to Danaher Tool Group on March 20, 2006. This modification included removal of an 8.1 mm BTU/Hr boiler (SN-18) and installation of a new 5.25 mm BTU/Hr boiler (SN-55). Total facility emissions were permitted at: 28.6 tpy PM/PM₁₀, 1.4 tpy SO₂, 1.6 tpy VOC, 4.6 tpy CO, 17.2 tpy NO_x, 0.99 tpy HNO₃, 1.12 tpy Ni, 0.50 tpy Cr⁺³, 0.01 tpy Cr⁺⁶, 0.93 tpy H₂SO₄, 0.61 tpy HCl, 0.47 tpy NaOH, 0.36 tpy H₃PO₄, 0.07 tpy NiSO₄, and 0.01 tpy Sn.

Permit No.: 1415-AR-6 was issued to Danaher Tool Group on January 2, 2007. This permitting action was necessary to remove (1) two existing dust collectors (SN-05 and SN-07), (2) a 400 HP, natural gas-fired boiler (SN-17), and (3) a barrel plating line #1 (SN-44); to install (1) two new dust collectors (SN-56 and SN-57) and (2) a new 250 HP, natural gas-fired boiler; and to relocate the existing Nickel/Chrome stripping line (SN-46). No changes in emissions will result from the Nickel/Chrome stripping line relocation. Permitted emission changes were: –1.1 tpy PM/PM₁₀, –1.8 tpy CO, –6.7 tpy NO_x, –0.01 tpy Nickel, –0.13 tpy Sulfuric Acid, 0.01 Sodium Hydroxide, and 0.01 tpy Tin.

- Permit No.: 1415-AR-6 was amended on August 24, 2007. This permitting action was necessary to add a new baghouse to control Machining and Grinding (SN-03) emissions. No additional emissions were anticipated from the new control device.

Permit No. 1415-AR-7 was issued to Danaher Tool Group on May 8, 2009. This permitting action was necessary to: 1) Remove two uniwashes (formerly SN-12 and SN-41, both IA) and replace with one new cyclone dust collector, 99.8% efficient, to control emissions from twelve (12) existing sanders in the Grinding Operation in Sub Plant 2 (SN-60); and 2) Remove two

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baghouses, 95% efficient, and replace with one new dust collector, 99.5% efficient, on combined Wheelabrator/Shot Blasters (SN-08 and 09). Permitted emissions decreased: -13.3 tpy PM/PM₁₀.

Permit #1415-AR-8 was issued to Danaher Tool Group on July 29, 2009. This permitting action was necessary to: Permit as an Insignificant Activity eight (8) Broach, two (2) Surface and three (3) Pedestal Grinders. The grinders will be controlled by a Torit-Day dust collector, rated 99.9% efficient. This equipment was transferred from the Armstrong facility, Fayetteville, AR.

Permit #1415-AR-9 was issued to Danaher Tool Group on October 20, 2009. This permitting action is necessary to: Replace the Nitric Acid Strip Baths' (SN-19) existing, 90% efficient scrubber with a new 95% efficient scrubber; Replace the Chrome and Nickel Strip Bath's (SN-46) existing scrubber with a new 95% efficient scrubber; Replace the existing exhaust fan for Rack Plate System #1 (SN-20 through SN-25) with a new exhaust fan; Replace the two existing exhaust fans for SN-45 and SN-47 with a single new exhaust fan; and Add two Insignificant Activities: Parts Washer Solvent (non-Hap cleaner) and several Miscellaneous Rinse Tanks (city water). The total permitted annual emission rate limit changes associated with these modifications include: -0.15 tpy HNO₃, and -0.03 tpy Ni.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas as the only fuel, by operating at or less than maximum capacity and by complying with Specific Condition #6. [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
03	Machining and Grinding (with Baghouse, 99.9% efficiency)	PM ₁₀	0.1	0.1
04	Machining and Grinding (with Baghouse, 99.9% efficiency)	PM ₁₀	0.1	0.1
06	Shot Blasting (with Baghouse, 95.0% efficiency)	PM ₁₀	2.4	10.4
08 & 09	Two Wheelabrators / Shot Blasting (with one Dust Collector, 99.8% eff)	PM ₁₀	0.2	0.8
10	Die Grinding (with Baghouse, 99.9% efficiency)	PM ₁₀	0.1	0.1
17	Boiler (Natural Gas, 10.0 MMBtu/hr, replacement installed January 2, 2007, formerly SN-58)	PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.9 1.0	0.4 0.1 0.3 3.7 4.4
18	Boiler (Natural Gas, 8.0 MM Btu/hr, replacement installed March 20, 2006, formerly SN-55)	PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.7 0.8	0.3 0.1 0.2 3.0 3.6
26	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1	0.1 0.1 0.1 0.1 0.3

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SN	Description	Pollutant	lb/hr	tpy
27	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
28	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
29	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
30	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
31	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
32	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
33	Generator (Natural Gas, 0.45 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.2

SN	Description	Pollutant	lb/hr	tpy
34	Rinse Furnace (Natural Gas, 0.3 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.2
35	Rinse Furnace (Natural Gas, 0.3 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.2
36	Heat-treat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
37	Heat-treat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
46	Chrome and Nickel Stripper Baths (2 Tanks, 265 gal each) (with 1 Scrubber, 95% efficiency)	VOC	0.1	0.1
56	Dust Collector for Impact Area	PM ₁₀	0.1	0.1
57	Dust Collector for 3P Area	PM ₁₀	0.1	0.1
60	Grinding Operation in Sub Plant 2 – Twelve (12) Sanders (one Cyclone Dust Collector, 99.8% eff.)	PM ₁₀	0.1	0.3
02, 05, 07, 12, 14, 15, 16, 17, 18, 41, 44	Equipment removed from Service.			

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SN	Description	Pollutant	lb/hr	tpy
Formerly 01, 11, 13, 38, 39, 40, 48, 49, 50, 51, 52, 53, 54	Insignificant Activities			
55, 58	Numbers removed from use with Permit #1415-AR-10.			

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas as the only fuel, by operating at or less than maximum capacity and by complying with Specific Condition #6. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
03	Machining and Grinding (with Baghouse, 99.9% efficiency)	PM	0.1	0.1
04	Machining and Grinding (with Baghouse, 99.9% efficiency)	PM	0.1	0.1
06	Shot Blasting (with Baghouse, 95% efficiency)	PM	2.4	10.4
08 & 09	Two Wheelabrators / Shot Blasting (with one Dust Collector, 99.8% eff)	PM ₁₀	0.2	0.8
10	Die Grinding (with Baghouse, 99.9% efficiency)	PM	0.1	0.1
17	Boiler (Natural Gas, 10.0 MMBtu/hr, replacement installed January 2, 2007, formerly SN-58)	PM	0.1	0.4
18	Boiler (Natural Gas, 8.0 MM Btu/hr, replacement installed March 20, 2006, formerly SN-55)	PM	0.1	0.3

SN	Description	Pollutant	lb/hr	tpy
19	Open Surface Nitric Acid Stripper Baths for (Rack Plate & Full Polish Plate Systems) (with 1 Scrubber, 95.0% efficiency)	HNO ₃ Ni	0.07 0.01	0.29 0.01
20	Trivalent Chromium Electroplating Bath (1380 gallon tank) (exhaust fan, non-control, for Rack Plate System #1 - SN-20 through SN-25)	Cr ⁺³	0.09	0.39
21	Nickel Electroplating Bath (90% Ni adheres to part) (6800 gallon tank) (exhaust fan, non-control, for Rack Plate System #1 - SN-20 through SN-25)	Ni	0.15	0.65
22	Sulfuric Acid Bath (exhaust fan, non-control, for Rack Plate System #1 - SN-20 through SN-25)	H ₂ SO ₄	0.15	0.64
23	Hydrochloric Acid Cleaning Bath (exhaust fan, non-control, for Rack Plate System #1 - SN-20 through SN-25)	HCl	0.10	0.42
24	Caustic Cleaning Bath (exhaust fan, non-control, for Rack Plate System #1 - SN-20 through SN-25)	NaOH	0.06	0.26
25	Caustic Cleaning Bath (exhaust fan, non-control, for Rack Plate System #1 - SN-20 through SN-25)	NaOH	0.05	0.20
26	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
27	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
28	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
29	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1

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SN	Description	Pollutant	lb/hr	tpy
30	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
31	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
32	Preheat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
33	Generator (Natural Gas, 0.45 MMBtu/hr)	PM	0.1	0.1
34	Rinse Furnace (Natural Gas, 0.3 MMBtu/hr)	PM	0.1	0.1
35	Rinse Furnace (Natural Gas, 0.3 MMBtu/hr)	PM	0.1	0.1
36	Heat-treat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
37	Heat-treat Furnace (Natural Gas, 0.7 MMBtu/hr)	PM	0.1	0.1
42	Caustic Cleaning Bath (210 gallon capacity)	NaOH	0.01	0.02
43	Phosphate and Nitric Acid Plating Bath (420 gallon capacity)	H ₃ PO ₄ HNO ₃ NiSO ₄	0.09 0.07 0.014	0.36 0.30 0.07
45	Barrel Plating Line #2 (hexavalent chrome plating, <u>no</u> electrical current) (exhaust fan, non- control, combined for SN-45 & SN-47)	Ni Cr ⁺⁶ H ₂ SO ₄ NaOH	0.01 0.00003 0.04 0.01	0.01 0.00013 0.16 0.01
46	Chrome and Nickel Stripper Bath (2 Tanks, 265 gal each) (with Scrubber, 95% efficiency)	Ni Cr ⁺³ HCl	0.01 0.01 0.05	0.01 0.01 0.19

SN	Description	Pollutant	lb/hr	tpy
47	Trivalent Chromium Electroplating (Rack Plate & Full Polish Plating Systems) (exhaust fan, non-control, combined for SN-45 & SN-47) (with Scrubber, 99% efficiency)	HNO ₃ Ni Cr ⁺³	0.05 0.10 0.03	0.21 0.40 0.11
56	Dust Collector for Impact Area	PM	0.1	0.1
57	Dust Collector for 3P Area	PM	0.1	0.1
60	Grinding Operation in Sub Plant 2 – Twelve (12) Sanders (one Cyclone Dust Collector, 99.8% eff.)	PM	0.1	0.3
02, 05, 07, 12, 14, 15, 16, 17, 18, 41, 44	Removed from Service.			
Formerly 01, 11, 13, 38, 39, 40, 48, 49, 50, 51, 52, 53, 54	Insignificant Activities			
55, 58	Numbers removed from use with Permit #1415-AR-10.			

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
03, 04, 06, 08, 09, 10, 19, 20, 21, 22, 23, 24, 25, 42, 43, 45, 46, 47, 56, 57, 60	5%	§18.501
17, 18, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37	5%	§18.501 (natural gas fired equipment)

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise

- prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 6. The permittee shall not process more than 23,725 tons of steel at the facility per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 7. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 8. The permittee shall operate all equipment and associated control devices within design specifications as described in the permit application at all times. Compliance with this condition shall be shown by recording the pressure drop reading on each baghouse, scrubber and hydrostatic precipitator, at least twice per calendar month. The pressure drop on all fabric filter baghouses which are exhausted outside shall be maintained between 1 and 6 inches of water. The pressure drop on the scrubber (SN-19) shall be maintained between 3.5 to 4.5 inches of water. These monthly records shall be maintained on site and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 9. The permittee shall use only pipeline quality natural gas as fuel. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

NESHAP Subpart N Conditions

10. The permittee is subject to the provisions of and shall comply with 40 CFR Part 63.304, Subpart N – NESHAP – *Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks* (Appendix A). SN-20 and SN-47, to which 40 CFR Part 63, Subpart N applies, are chromium electroplating or chromium anodizing tanks performing hard chromium electroplating, decorative chromium electroplating or chromium anodizing. [Regulation 19, §19.303 and 40 CFR §63.340(a)]
11. The permittee shall operate the trivalent chromium electroplating tanks (SN-20 and SN-47) with a wetting agent present in the bath ingredients at all times. The permittee shall demonstrate compliance with this condition by keeping records of the bath components purchased, with the wetting agent clearly identified as a bath constituent contained in one of the components. The permittee shall maintain Material Safety Data Sheets (MSDS) or equivalent documentation on-site. These records shall be maintained for a period of at least 5 years. [Regulation 19, §19.304, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, 40 CFR §63.346(b)(14)(c) and 40 CFR §63.347]

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12. The permittee shall submit a report within 30 days of making any changes in the trivalent chromium electroplating processes. The report shall include the manner in which the process has been changed and the emission limitation, if any, now applicable to the affected source. [Regulation 19, §19.304, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR §63.347]

NSPS Conditions

13. The permittee is subject to and shall comply with all applicable provisions of New Source Performance Standards (NSPS), 40 CFR 60, Subpart Dc (Appendix B). The permittee shall calculate, record and maintain records of the amount of natural gas or LP gas combusted in the boiler (SN-18) subject to Subpart Dc during each month. [Regulation 19, §19.705 and 40 CFR 60, Subpart Dc]
14. The permittee is responsible for other requirements listed in Subpart Dc that may affect the facility. All records required by Subpart Dc shall be maintained by the permittee for a period of two (2) years following the date of such record. A copy of Subpart Dc is attached to this permit as Appendix B. [Regulation 19, §19.705 and §60.48c]

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated (*insert application date*).

Description	Category
Five (5) Heat treat and Pre-heat natural gas-fired furnaces, 0.7 MMBtu/hr (formerly SN-48 through SN-52)	A-1
One (1) Rx Generator natural gas-fired, 0.045 MMBtu/hr (formerly SN-53)	A-1
One (1) Ryman Grinding Operation, nine (9) baghouses, 99.9% efficient (formerly SN-01)	A-13
One (1) Grinding Operation, exhausted indoors, with Hydrostatic precipitator, 90.0% efficient (formerly SN-11)	A-13
One (1) Grinding Operation, exhausted inside, with Roto-Clone Baghouse, 99.9% efficient (formerly SN-13)	A-13
Three (3) Grinding Operations, exhausted inside, with Roto-Clone dust collector, 95.0% efficient (formerly SN-38, 39 and 40)	A-13
Opti-flow dust collector, 99.9% efficient (formerly SN-54)	A-13
Eight (8) Broach, two (2) Surface and three (3) Pedestal grinders with dust collector, 99.9% efficient	A-13
Parts Washer Solvent (non-Hap cleaner)	A-13
Several Miscellaneous Rinse Tanks (city water)	A-13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317
7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following

- time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
 9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
 11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]
 19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:

- a. Such an extension does not violate a federal requirement;
- b. The permittee demonstrates the need for the extension; and
- c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:

- a. Such a request does not violate a federal requirement;
- b. Such a request is temporary in nature;
- c. Such a request will not result in a condition of air pollution;
- d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:

- a. The request does not violate a federal requirement;
- b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
- c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

APPENDIX A
40 CFR Part 63, Subpart N

APPENDIX B

40 CFR Part 60, Subpart Dc