Baxter

January 24, 2025

Indiana Dept of Environmental Mgmt
Compliance & Enforcement Brach
Office of Air Quality
100 North Senate Ave
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
7005 1820 0002 4009 5238

US EPA Region 5
Air and Radiation Division
Air Enforce Branch- IN (AE-17J)
77 West Jackson Blvd
Chicago, IL 60604-3590
7005 1820 0002 4009 5245

Subject: RY2024 Annual NESHAP WWWWWW Compliance Certification

Please find the enclosed "*Baxter / Hill-Rom Batesville Plating Shop RY2024 Annual Compliance Statement*" as it relates to reporting requirements found in NESHAP WWWWWW for our plating facility located at 101 W. Pearl Road, Batesville, IN, 47006.

This certification report is required to be submitted to you by Jan 31 annually per our *Minor Source Operating Permit* #137-45984-0002, Section E.3.2.

Feel free to give me a call if you have any questions.

Sincerely,

J. Mark Atkinson
Sr. Environmental Engineer
812-212-3781 cell

Enclosure

Baxter/Hill-Rom Batesville Plating Shop
RY2024 Annual Compliance Statement
40 CFR 63 Subpart WWWWWW

The Baxter Plating Building in Batesville, Indiana consists of three electrolytic and one electroless plating lines. One of the electrolytic plating lines uses nickel (aka double nickel) as the plating material. The other electrolytic plating lines, aka barrel and rack plating lines, use zinc. In addition to the electrolytic plating line using nickel, the electroless line uses nickel as well. Of these four lines, only two lines (nickel) are regulated by the area source hazardous air pollutant (HAP) regulations, specifically the standards and management practices in 63.11507(a)(l), located within 40 CFR 63, Subpart 6W. This regulation applies to electroplating processes that use or emit specific metal HAPs which includes nickel.

Per 40 CFR 63.11507(a)(l), the facility added wetting agent/fume suppressant to the electrolytic nickel-plating bath according to the manufacturer's specifications and instructions.

The chemical wetting agent product name and manufacturer/supplier:

Product Name: Technibrite NI-105
Manufacturer/Supplier: Asterion, Inc

In addition, the facility utilizes a packed bed scrubber and venting system to capture and control emissions from the electroless nickel plating process per 40 CFR 63.11507(a)(2). The scrubber must be operated in accordance with the manufacturer's specifications and operating instructions.
Manufacturer instructions must be kept at the facility and easily accessible by operators.

Per 40 CFR 63.11508(d)(8), the facility has implemented the applicable management practices, as practical in accordance with 40 CFR 63.11507(g):

1. Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
2. Maximize the draining of bath solution back into the tank, as practicable, by extending

drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.

3. Optimize the design of barrels, racks, and parts to minimize drag-out of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank}, as practicable.

4. Use tank covers, if already owned and available at the facility, whenever practicable.

5. Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).

6. Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.

7. Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre- treated parts to be plated, as practicable.

8. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.

9. Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.

10. Minimize spills and overflow of tanks, as practicable.

11. Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.

12. Perform regular inspections to identify leaks and other opportunities for pollution prevention.

Any deviations of the wetting agent requirement, utilization of the packed-bed scrubber, or implementation of the twelve (12) management practices, as practical, during the previous calendar year must be specified below. If there are no deviations identified, then state as such:

No deviations were incurred during CY2024

If any deviations are identified, a report must be submitted to the Indiana Department of Environmental Management (IDEM). If no deviations are identified, then this signed compliance certification statement must be kept on file {in writing or electronic) and available for review if requested by IDEM or EPA. An electronic copy of this certification, once signed by the Plating Building Operations Manager and Ritter Plant Manager, must be attached to the Benchmark Compliance Calendar task in order to close the task.

This certification statement or if necessary, a deviation report must be sent to IDEM, no later than January 31st for the previous calendar year.

Certification Statement:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this certification are true, accurate, and complete.

Name: David Poth

Signature: _____ 14 JAN2025

Plating Operations Manager — Date

Name: Steven M. Bennett

Signature: _____ 14 JAN 2025

Batesville Plant Manager — Date

CERTIFIED MAIL

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