

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

150 West Congress Street • Tucson, AZ 85701 • Phone: (520) 740-3340

AIR QUALITY OPERATING PERMIT

(As required by Title 17.12, Article II, Pima County Code)

ISSUED TO

T3 ENGINEERED PRODUCTS

2560 NORTH COYOTE #108

TUCSON, AZ 85745

This air quality operating permit does not relieve applicant of responsibility for meeting all air pollution regulations

THIS PERMIT IS ISSUED SUBJECT TO THE SPECIFIC CONDITIONS CONTAINED IN THIS PERMIT

PDEQ PERMIT NUMBER 1347 PERMIT CLASS II EXPIRATION DATE April 05, 2012

PERMIT ISSUED THIS SIXTH DAY OF APRIL, TWO THOUSAND SEVEN



SIGNATURE

Tina Gingras Air Program Manager, PDEQ

TITLE

**T3 Engineered Products
Air Quality Permit # 1347**

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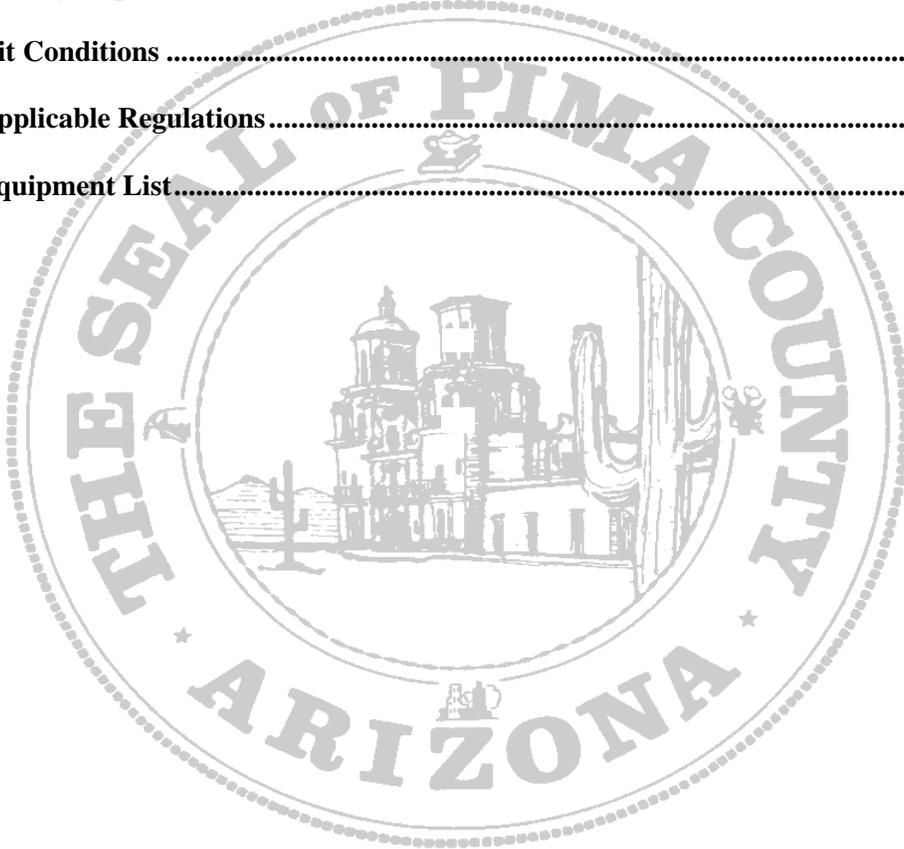
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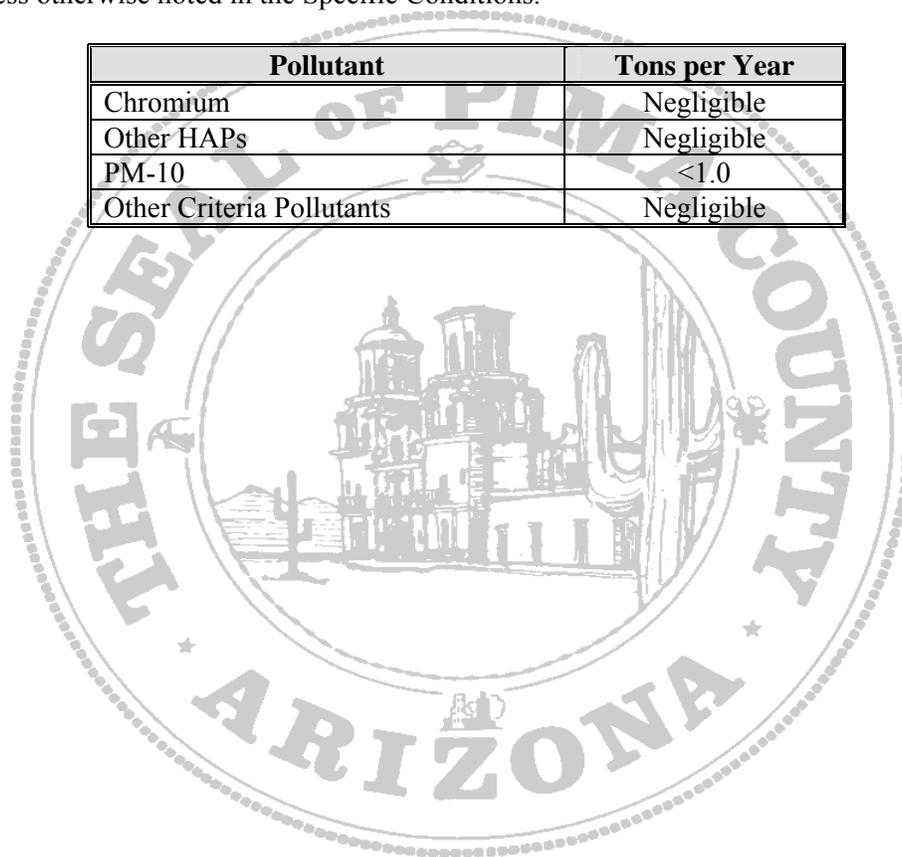
**T3 Engineered Products
Air Quality Permit # 1347**

SUMMARY

This Class II permit is the first 5-year air quality permit to be issued to T3 Engineered Products, (formerly Triangle Industrial Corporation), the Permittee. This facility is an *area source of HAPs* and a *true minor source of all criteria pollutants*. This facility is a stationary source as defined by Title 17 of the Pima County Code, Title 18 of the Arizona Revised Statutes, and the Clean Air Act. The source is a large hard chromium electroplater which operates numerous tanks, one of which was not operational at the time of permit issuance, but may subsequently come on-line. The source is subject to 40 CFR 63 Subpart N - NESHAPs for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

The following emission rates are for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted in the Specific Conditions.

Pollutant	Tons per Year
Chromium	Negligible
Other HAPs	Negligible
PM-10	<1.0
Other Criteria Pollutants	Negligible



**T3 Engineered Products
Air Quality Permit #1347**

SPECIFIC CONDITIONS

[References are to Title 17 of the Pima County Code unless otherwise noted]

I. APPLICABILITY

The source covered by this permit constitutes an *area source of HAPs (Chromium Compounds)* and a *true minor source of all criteria pollutants* based on 8760 hours of operation per year and considering emissions from all emission sources of the same SIC Code at this facility. Operations specifically addressed by the permit fall under the following categories:

- A. **Hard Chromium Electroplating** – Pieces of equipment which conduct hard chromium electroplating by applying an electric current including the following internal and external components needed for chromium electroplating: tanks, rectifiers, anodes, heat exchanger equipment, circulation pumps, and air agitation systems.
- B. Affected Emission Source Classification: **Class II; Large Area Source for HAPs, True Minor Source for Criteria Pollutants.**

II. EMISSION LIMITS AND STANDARDS

[PCC 17.12.185.A.2][**Federally Enforceable Conditions**]

- A. The emission limitations in this section apply during tank operation (i.e. when current and/or voltage is being applied) and during periods of startup and shutdown. The following emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance required by II.F of the Specific Conditions must be followed during malfunctions: [40 CFR 63.342(b)(1)]
- B. At all times when the chromium electroplating is taking place in any tank or combination of tanks, the Permittee shall operate the corresponding air pollution control device(s) identified in Attachment 2 of this permit to meet the emission limitation in II.C of the Specific Conditions. [40 CFR 63.342(b)(2)]
- C. The Permittee shall not allow the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 mg/dscm (6.6×10^{-6} gr/dscf) from any chromium electroplating tank. [40 CFR 63.342(e)(2)(i)]
- D. The emission limitation established in II.C of the Specific Conditions must be met at the outlet of each add-on air pollution control device. [40 CFR 63.344(e)(2)]
- E. Operation and Maintenance Practices [40 CFR 63.342(f)(1)]
 - 1. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices.
 - 2. Malfunctions shall be corrected as soon as practicable after their occurrence.
 - 3. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

F. Operation and Maintenance Plan (O&M Plan)

1. The Permittee shall prepare an O&M Plan* that includes the following elements:
[40 CFR 63.342(f)(3)(i)]
 - a. The plan shall specify the operation and maintenance criteria for all chromium electroplating tanks and the air pollution control devices. The O&M plan shall include a standardized checklist to document the operation and maintenance of this equipment;
[40 CFR 63.342(f)(3)(i)(A)]
 - b. The Permittee shall propose operation and maintenance practices for the air pollution control device for approval by the Control Officer. These proposed operation and maintenance practices shall be submitted for approval as part of the submittal required under V.C of the Specific Conditions.
[40 CFR 63.342(f)(3)(i)(C)]
 - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and
[40 CFR 63.342(f)(3)(i)(D)]
 - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and for implementing corrective actions to address such malfunctions.
[40 CFR 63.342(f)(3)(i)(E)]
 - *e. The Permittee developed and submitted O & M plans titled SC1, SC2, SC3 and SC4 which have been reviewed and approved by the Control Officer.
2. If the O&M plan 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 O&M plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment or add-on air pollution control device during similar malfunction events, and a program for corrective action for such events.
[40 CFR 63.342(f)(3)(ii)]
3. To satisfy the requirements of paragraph II.F.1 of the Specific Conditions, the Permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of II.F.1 of the Specific Conditions.
[40 CFR 63.342(f)(3)(vi)]

G. Operation and Maintenance Procedures Oversight [40 CFR 63.342(f)(2)]

1. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Control Officer, which may include, but is not limited to, monitoring results; review of the O&M plan, procedures, and records; and inspection of the source.
2. Based on the results of a determination made under II.G.1 of the Specific Conditions, the Control Officer may require the Permittee to make changes to the O&M plan required by paragraph II.F of the Specific Conditions. Revisions may be required if the Control Officer finds that the plan:
 - a. Does not address a malfunction that has occurred;

- b. Fails to provide for the proper operation of the affected source, the air pollution control techniques, or the control system and 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.

H. Should the Permittee increase actual or potential emissions of hazardous air pollutants such that the source becomes a major source, the Permittee must comply with the provisions for existing major sources, including the reporting provisions of 40 CFR 63.347(g), and shall submit the appropriate Class I permit application. [PCC 17.12.140, PCC 17.12.260 & 40 CFR 63.343(a)(3)]

III. MONITORING REQUIREMENTS

[PCC 17.12.185.A.3.f]

The Permittee shall incorporate the monitoring parameters required by II.A.3.a.i of the Specific Conditions into the O&M plan and abide by it. The schedule shall include a monitoring frequency of at least one inspection per operating day.

IV. RECORDKEEPING REQUIREMENTS

[PCC 17.12.185.A.4]

A. The Permittee shall keep the written O&M plans approved by the Control Officer on-site to be made available for inspection, upon request, by the Control Officer for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the O&M plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the O&M plan on record to be made available for inspection, upon request, by the Control Officer for a period of 5 years after each revision to the O&M plan. [40 CFR 63.342(f)(3)(v)] **[Federally Enforceable Condition]**

B. The Permittee shall maintain the following records: [40 CFR 63.346(b.1 – 6 & 9-11)]
[Federally Enforceable Conditions]

1. Inspection records for the add-on air pollution control device and monitoring equipment, to document that the inspection and maintenance required by II.E & F.1.b of the Specific Conditions have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
2. Records of all maintenance performed on the affected source, the add-on air pollution control device and monitoring equipment;
3. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
4. Records of actions taken during periods of malfunction when such actions are inconsistent with the O&M plan required by II.F of the Specific Conditions;
5. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the O&M plan required by II.F of the Specific Conditions;
6. Test reports documenting results of all performance tests;

7. 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 during malfunction of the process, add-on air pollution control, or monitoring equipment;
8. 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 during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;
9. The total process operating time of the affected source during the reporting period;
10. All documentation supporting the notifications and reports required by 40 CFR 63.9, 40 CFR 63.10, and 40 CFR 63.347.

C. All records shall be maintained on-site for at least 5 years. [PCC 17.12.185.A.4.b & 40 CFR 63.346(c)]
[Federally Enforceable Condition]

D. The Permittee shall retain a copy of the permit at the permit site and comply with the permit posting requirements of PCC 17.12.080. [PCC 17.12.080]

V. REPORTING REQUIREMENTS [PCC 17.12.185.A.5 & 17.12.210]

A. The Permittee shall fulfill all reporting requirements outlined in V of the Specific Conditions. [40 CFR 63.347(a)]**[Federally Enforceable Condition]**

B. The Permittee shall have submitted initial notifications* to the Control Officer for tanks operational before January 25, 1995. [40 CFR 63.347(c)(1)]**[Federally Enforceable Condition]**

*The Permittee submitted a renewal application with an initial notification dated 01/18/95. This was considered as the official initial notification of being subject to 40 CFR 63 Subpart N.

C. The Permittee shall submit a notification of the actual date of startup of Tank 11 within 30 calendar days after such date. [40 CFR 63.347(c)(2)(iii)]**[Federally Enforceable Condition]**

D. Prior to startup, the Permittee shall submit information on the air pollution control devices (SC3) that includes: [40 CFR 63.343(d)]**[Federally Enforceable Conditions]**

1. A description of the device;
2. Test results collected in accordance with VI.A of this permit verifying the performance of the device for reducing chromium emissions to the atmosphere to the level required by II.A.1 of the Specific Conditions;
3. A copy of the O&M plan required by II.E, F & G of the Specific Conditions including operation and maintenance practices; and
4. Appropriate operating parameters that will be monitored to establish continuous compliance with the standards. The monitoring plan submitted identifying the continuous compliance monitoring method is subject to the Control Officer's approval.

E. If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the O&M plan required by II.G.1 of the Specific Conditions, the Permittee shall record

the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with the Control Officer. [40 CFR 63.342(f)(3)(iv)]

[Federally Enforceable Condition]

- F. With respect to the initial performance tests required by VI.A of this permit, the Permittee shall submit the following to the Control Officer: [40 CFR 63.347(d)] **[Federally Enforceable Conditions]**
1. The Permittee shall notify the Control Officer in writing of his or her intention to conduct a performance test on Tank 11 at least 60 calendar days before the test is scheduled to begin to allow the Control Officer to have an observer present during the test. Observation of the performance test by the Control Officer is optional.
 2. In the event the Permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) apply.
- G. Compliance Status Notifications [40 CFR 63.347(e)(2)(i - vii & ix)] **[Federally Enforceable Conditions]**
1. The Permittee shall submit a notification of compliance status regarding Tank 11 to the Control Officer once that tank becomes operational. The notification shall include:
 - a. The applicable emission limitation and the methods that were used to determine compliance with this limitation;
 - b. The test report documenting the results of the performance test, which contains the elements required by 40 CFR 63.344(a), including measurements and calculations to support the special compliance provisions II.F of the Specific Conditions;
 - c. The type and quantity of hazardous air pollutants emitted by the source reported in mg/dscm. (If the Permittee had previously submitted emission estimates for Tank 11, he or she shall state that this report corrects or verifies the previous estimate.)
 - d. For each monitored parameter for which a compliant value is to be established under II.F.1.a & b of the Specific Conditions, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;
 - e. The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements;
 - f. A description of the air pollution control technique for each emission point;
 - g. A statement that the Permittee has completed and has on file the O&M plan as required by II.E, F & G of the Specific Conditions;
 - h. A statement by the Permittee as to whether Tank 11 has complied with the provisions of 40 CFR 63 Subpart N.
 - i. Performance test results. [40 CFR 63.347(f)]
 - j. The notification of compliance status shall be submitted to the Control Officer no later than 90 calendar days following completion of the compliance demonstration required by 40 CFR 63.7 and VI.A of the Specific Conditions. [40 CFR 63.347(e)(3) & 40 CFR 63.347(f)]

H. Status Reports

[40 CFR 63.347(h)][**Federally Enforceable Conditions**]

1. Summary Reports

- a. Except as provided in paragraph V.H.2 of the Specific Conditions, the Permittee shall complete a summary report to document the ongoing compliance status of the source. The report shall be completed annually, (within 30 days of the anniversary date of permit issuance), retained on site, and made available to the Control Officer upon request. These reports shall contain the following information:

[40 CFR 63.347(h)(1) & (g)(3)(i – vi) & (vii – xii)]

- i. The company name and address of the affected source;
- ii. An identification of the operating parameter that is monitored for compliance determination, as required by II.F.1.a & b of the Specific Conditions;
- iii. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by V.G of the Specific Conditions;
- iv. The beginning and ending dates of the reporting period;
- v. A description of the type of process performed in the affected source;
- vi. The total operating time of the affected source during the reporting period;
- vii. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- viii. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in II.E & F.1.b of the Specific Conditions were followed in accordance with the O&M plan;
- ix. If the O&M plan required by II.F of the Specific Conditions was not followed, an explanation of the reasons for not following the conditions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by V.D of the Specific Conditions documenting that the O&M plan was not followed;
- x. A description of any changes in monitoring, processes, or controls since the last reporting period;
- xi. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- xii. The date of the report.

2. Reports of Exceedances

[40 CFR 63.347(h)(2)]

- a. If both of the following conditions are met the Permittee shall prepare and submit an updated summary report as described in V.H.1 of the Specific Conditions to the Control Officer:
 - i. The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee of the affected source in accordance with II.F.1.a & b of the Specific Conditions) is 1 percent or greater of the total operating time for the reporting period; and
 - ii. The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.
- b. Once the Permittee reports an exceedance as defined in paragraph V.H.2.a of the Specific Conditions, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under 40 CFR 63.347(h)(3) is approved.
- c. The Control Officer may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

I. Emissions Inventory Reporting:

[PCC 17.12.320]

The Permittee shall complete and submit to the Control Officer, when requested, an annual emissions inventory questionnaire pursuant to 17.12.320 of the Pima County Code.

VI. TESTING REQUIREMENTS

[PCC 17.12.185.A.3.a & 17.20.010]

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

- A. The Permittee is required to conduct an initial performance test on each existing combination of tank and air-pollution control device as required under §63.7 using the procedures and test methods listed in 40 CFR 63.7 and 63.344. [40 CFR 63.343(b)(1)][**Federally enforceable condition**]
 - 1. The Permittee completed the testing for SC-1 with Tanks 1-4 and SC-2 with Tanks 5-10 on March 28, 2000 and June 24, 2002, respectively. SC2
 - 2. Should Tank 11 become operational, the Permittee shall conduct initial testing on Tank 11 and SC-3 in accordance with 40 CFR 63.343(b) and 40 CFR 63.344(a) & (c).
- B. Should the Permittee desire or be required to conduct additional testing to determine compliance with any applicable standard, the Permittee shall contact the Control Officer for appropriate test methods. [PCC 17.20.010.D]

ADDITIONAL PERMIT CONDITIONS

I. COMPLIANCE WITH PERMIT CONDITIONS

[PCC 17.12.185.A.7.a & b]

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- B. The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below: [PCC 17.12.185.A.5 & PCC 17.12.040]
1. Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emission that includes all available information pursuant to PCC 17.12.040.B. To report excess emissions call **520-740-3340** or fax to **520-882-7709**.
 2. Detailed written notification by submission of an excess emissions report within 72 hours of the notification in I.B.1 above. **Send to PDEQ 150 W. Congress St., Tucson, Arizona 85701.**
- C. It shall not be a defense for a 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.
- D. The permit does not convey any property rights of any sort, or any exclusive privilege to the permit holder.
- E. The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.510. [PCC 17.12.185.A.9 & PCC 17.12.510]

II. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

[PCC 17.12.185.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

III. DUTY TO PROVIDE INFORMATION

[PCC 17.12.165.G & PCC 17.12.185.A.7.e]

- A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

IV. SEVERABILITY CLAUSE

[PCC 17.12.185.A.6]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

**T3 Engineered Products
Air Quality Permit # 1347**

ATTACHMENT 1: APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable:

Title 40 of the Code of Federal Regulations Part 63:

Subpart N National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

Pima County Code (PCC) Title 17, Chapter 17.16:

17.16.530.B.14 Subpart N National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks



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ATTACHMENT 2: EQUIPMENT LIST

I. Hard Chromium Electroplating Tanks

Tank ID	Volume	Scrubber	Rectifier(s)	Initial/ Retest Date
T 1	475 gal	SC 1	R-0	March 28, 2000
T 2	650 gal	SC 1	R-1	March 28, 2000
T 3	1450 gal	SC 1	R-2, R-3	March 28, 2000
T 4	850 gal	SC 1	R-4	March 28, 2000
T 5	700 gal	SC 4	R-8, R-9	July 21, 2007
T 6	1322 gal	SC 2	R-7	June 24, 2002
T 7	1322 gal	SC 2	R-6	June 24, 2002
T 8	1322 gal	SC 2	R-5	June 24, 2002
T 9	2520 gal	SC 2	R-11	June 24, 2002
T 9-A	740 gal	SC 2	R-ET	June 24, 2002
T 10	3625 gal	SC 2	R-10	June 24, 2002
T 11	3800 gal	SC 3	R-13	Inactive tank

II. Hard Chromium Rectifiers

Rectifier	Make	Model	Serial #	Capacity	Tank(s)
R-0	Clinton	S4012HOS	29293	4000 amp	T 1
R-1	Clinton	35012HOS	29316	500 amp	T 2
R-2	Clinton	RS012HOS	24005	6000 amp	T 3
R-3	Clinton	R6012HO	24690	6000 amp	T 3
R-4	Clinton	R5012HOS	31672	5000 amp	T 4
R-5	Clinton	S5012HOS	34693	5000 amp	T 8
R-6	Clinton	R10M12CB	23891	10,000 amp	T 7
R-7	Clinton	S10M12CB	28882	10,000 amp	T 6
R-8	Clinton	S6012COS	34591	6000 amp	T 5
R-9	Clinton	2S4012HOS	29221	4000 amp	T 5
R-10	Clinton	R12M12CB	25061	12,000 amp	T 10
R-11	Clinton	R10M12CB	23942	10,000 amp	T 9
R-13	Clinton	S4012SOS	37118	4000 amp	T 11
R-ET	Clinton	S5012HOS	Rebuilt	5000 amp	T 9A

III. Scrubbers

Scrubber	Type	Blower HP	Outlet Velocity	Tanks
SC 1	Composite Mesh Pad	1.5	650 cfm	T 1, 2, 3, 4
SC 2	Composite Mesh Pad	1.5	650 cfm	T 6, 7, 8, 9, 9A, 10
SC 3	Composite Mesh Pad	1.5	650 cfm	T 11
SC 4	Composite Mesh Pad	5	650 cfm	T 5, Chrome Purification Tank