

Mr. Louis A. Kulekowskis  
East Chicago Lining Shop, Union Tank Car Company  
1100 East 145th Street  
East Chicago, Indiana 46312

Re: **089-12166**  
First Administrative Amendment to  
**FESOP 089-6216-00343**

Dear Mr. Kulekowskis:

East Chicago Lining Shop, Union Tank Car Company was issued a permit on December 10, 1996, for a tank car interior lining and coating source. A letter requesting a change in the limit duration from fixed monthly emission limits to rolling twelve (12) consecutive month totals, but keeping the same numerical limit was received on April 12, 2000. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

Conditions D.1.1 b) and D.1.2 have been revised as well as the Quarterly Report Form has been replaced as follows:

D.1.1 Volatile Organic Compound

- b) The total volatile organic compound (VOC) emissions from the one (1) exterior paint booth and nine (9) tank car lining stations shall not exceed **23.28 tons per twelve (12) consecutive month period, rolling monthly** ~~1.94 tons per month~~. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.2 Hazardous Air Pollutants

The hazardous air pollutant emissions shall be limited as follows:

- a) A single hazardous air pollutant (HAP) emissions shall not exceed **9.0 tons per twelve (12) consecutive month period, rolling monthly** ~~0.75 tons per month~~.
- b) Any combination of HAPs emissions shall not exceed **24 tons per twelve (12) consecutive month period, rolling monthly** ~~2.0 tons per month~~.

Therefore, the requirements of 326 IAC 2-7 do not apply.

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

**FESOP Quarterly Report**

Source Name: ~~East Chicago Lining Shop, Union Tank Car Company~~  
Source Address: ~~1100 East 145th Street, East Chicago, Indiana 46312~~  
FESOP No.: ~~F 089-6216-00343~~  
Facility: ~~One (1) Exterior Paint Booth and Nine (9) Tank Car Lining Stations~~  
Parameter: ~~VOC and HAPs Delivered to the Applicators~~  
Limit: ~~0.75 tons per month of any single HAP.  
2.00 tons per month of any combination of HAPs.  
1.94 tons per month of VOC.~~

**Year:** \_\_\_\_\_

<b>Month</b>	<b>Total VOC Paint Booth and Nine Lining Stations (tons)</b>	<b>Combination of HAPs Paint Booth and Nine Lining Stations (tons)</b>	<b>Worst Case Single HAP Paint Booth and Nine Lining Stations (tons)</b>

9 ~~\_\_\_\_\_~~ No deviation occurred in this quarter.

9 ~~\_\_\_\_\_~~ Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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

**FESOP Quarterly Report**

**Source Name:** East Chicago Lining Shop, Union Tank Car Company  
**Source Address:** 1100 East 145th Street, East Chicago, Indiana 46312  
**FESOP No.:** F 089-6216-00343  
**Facility:** One (1) Exterior Paint Booth and Nine (9) Tank Car Lining Stations  
**Parameter:** VOC Delivered to the Applicators  
**Limit:** 23.28 tons per twelve (12) consecutive month period, rolling monthly

**YEAR:** \_\_\_\_\_

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

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

**FESOP Quarterly Report**

**Source Name:** East Chicago Lining Shop, Union Tank Car Company  
**Source Address:** 1100 East 145th Street, East Chicago, Indiana 46312  
**FESOP No.:** F 089-6216-00343  
**Facility:** One (1) Exterior Paint Booth and Nine (9) Tank Car Lining Stations  
**Parameter:** Single HAP Delivered to the Applicators  
**Limit:** Nine (9.0) tons per twelve (12) consecutive month period, rolling monthly

**YEAR:** \_\_\_\_\_

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

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

**FESOP Quarterly Report**

**Source Name:** East Chicago Lining Shop, Union Tank Car Company  
**Source Address:** 1100 East 145th Street, East Chicago, Indiana 46312  
**FESOP No.:** F 089-6216-00343  
**Facility:** One (1) Exterior Paint Booth and Nine (9) Tank Car Lining Stations  
**Parameter:** Combination of HAPs Delivered to the Applicators  
**Limit:** Twenty-four (24) tons per twelve (12) consecutive month period, rolling monthly

**YEAR:** \_\_\_\_\_

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments  
MLK/MES

cc: File - Lake County  
U.S. EPA, Region V  
Lake County Health Department  
Gary Division of Air Pollution Control  
Northwest Regional Office  
Air Compliance Section Inspector - Rick Massoels  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 1-800-451-6027

**East Chicago Lining Shop, Union Tank Car Company  
1100 East 145th Street  
East Chicago, Indiana 46312**

East Chicago Lining Shop, Union Tank Car Company is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 089-6216-00343	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 10, 1996
First Administrative Amendment AAF 089-12166-00343	Affected Pages: 21, 21a, 29, 29a and 29b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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	<p>One (1) exterior paint area, known as #42, equipped with dry filters for PM overspray control, equipped with air-assisted airless spray applicators, exhausted through stacks EP18 and EP19, capacity: 0.20 tank cars per hour.</p> <p>Nine (9) tank car lining stations, equipped with airless spray applicators, known as Stations #1 - #9, exhausted through stacks EP10, EP12, EP13 and EP16, capacity: 0.20 tank cars per hour.</p>	
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	<p>Parts blast cabinet, equipped with a baghouse, known as #39, exhausted through stack EP22, capacity: 37.5 pounds per hour.</p> <p>Interior blast area, equipped with a baghouse, known as #30, exhausted through stack EP7.</p>	
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## SECTION D.1 FACILITY OPERATION CONDITIONS

One (1) exterior paint area, known as #42, equipped with dry filters for PM overspray control, equipped with air-assisted airless spray applicators, exhausted through stacks EP18 and EP19, capacity: 0.20 tank cars per hour.

Nine (9) tank car lining stations, equipped with airless spray applicators, known as Stations #1 - #9, exhausted through stacks EP10, EP12, EP13 and EP16, capacity: 0.20 tank cars per hour.

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

#### D.1.1 Volatile Organic Compound

- a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), and CP 089-2402, the volatile organic compound (VOC) content of coating applied to the metal tank cars shall be limited to 3.5 pounds of VOC per gallon of coating less water, for forced air dried and extreme performance coatings. Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- b) The total volatile organic compound (VOC) emissions from the one (1) exterior paint booth and nine (9) tank car lining stations shall not exceed 23.28 tons per twelve (12) consecutive month period, rolling monthly. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.2 Hazardous Air Pollutants

The hazardous air pollutant emissions shall be limited as follows:

- a) A single hazardous air pollutant (HAP) emissions shall not exceed 9.0 tons per twelve (12) consecutive month period, rolling monthly.
- b) Any combination of HAPs emissions shall not exceed 24.0 tons per twelve (12) consecutive month period, rolling monthly.

Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.3 Particulate Matter Overspray

The one (1) exterior paint booth and nine (9) tank car lining stations shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows:  $E = 4.10 P^{0.67}$ , where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. For process weights in excess of sixty thousand (60,000) pounds per hour,  $E = 55.0 P^{0.11} - 40$ .

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

#### D.1.4 Daily Visible Emissions Notations

Daily visible emission notations of the stack exhausts from the one (1) exterior paint booth and nine (9) tank car lining stations 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, 80 percent 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

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

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**FESOP Quarterly Report**

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Source Address: 1100 East 145th Street, East Chicago, Indiana 46312  
FESOP No.: F 089-6216-00343  
Facility: One (1) Exterior Paint Booth and Nine (9) Tank Car Lining Stations  
Parameter: VOC Delivered to the Applicators  
Limit: 23.28 tons per twelve (12) consecutive month period, rolling monthly

YEAR: \_\_\_\_\_

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
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**FESOP Quarterly Report**

Source Name: East Chicago Lining Shop, Union Tank Car Company  
Source Address: 1100 East 145th Street, East Chicago, Indiana 46312  
FESOP No.: F 089-6216-00343  
Facility: One (1) Exterior Paint Booth and Nine (9) Tank Car Lining Stations  
Parameter: Single HAP Delivered to the Applicators  
Limit: Nine (9.0) tons per twelve (12) consecutive month period, rolling monthly

YEAR: \_\_\_\_\_

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
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**FESOP Quarterly Report**

Source Name: East Chicago Lining Shop, Union Tank Car Company  
Source Address: 1100 East 145th Street, East Chicago, Indiana 46312  
FESOP No.: F 089-6216-00343  
Facility: One (1) Exterior Paint Booth and Nine (9) Tank Car Lining Stations  
Parameter: Combination of HAPs Delivered to the Applicators  
Limit: Twenty-four (24.0) tons per twelve (12) consecutive month period, rolling monthly

YEAR: \_\_\_\_\_

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_