



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: December 31, 2007
RE: Tangent Rail Products, Inc. / 167-17590-00036
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY AND VIGO COUNTY AIR POLLUTION CONTROL

**Tangent Rail Products, Inc
2525 Prairieton Road,
Terre Haute, Indiana 47808**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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.: T167-17590-00036	
Original signed by:	Issuance Date: December 31, 2007
Matt Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Expiration Date: December 31, 2012

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	5
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
B. GENERAL CONDITIONS	7
B.1 Definitions [326 IAC 2-7-1]	
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 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]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16 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]	
B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.21 Source Modification Requirement [326 IAC 2-7-10.5]	
B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	19
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1 Opacity [326 IAC 5-1]	
C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4 Fugitive Dust Emissions [326 IAC 6-4]	
C.5 Stack Height [326 IAC 1-7]	
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-7-6(1)]	
C.7 Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

- C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
- C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

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

- C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 26

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

- D.1.1 Particulate Matter (Particulate emission Limitations for Sources of Indirect Heating
[326 IAC 6-2-3]
- D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-4-3]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 27

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

- D.2.1 Particulate Emission Limitation for manufacturing Process [326 IAC 6-3-2]
- D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-4-3]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 28

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

- D.3.1 Standard of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum
Liquid Storage Vessels) [326 IAC 12-1][40 CFR 60, Subpart Kb]

D.4. EMISSIONS UNIT OPERATION CONDITIONS..... 30

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

- D.4.1 Particulate Emission Limitation for Manufacturing Process [326 IAC 6-3-2]
- D.4.2 Particulate Emission Limitation for Manufacturing Process [326 IAC 6-3-2]

Compliance Determination Requirements

- D.4.3 Particulate Matter

Certification 31
Emergency Occurrence Report 32
Semi-Annual Natural Gas Fired Boiler Certification..... 34
Quarterly Deviation and Compliance Monitoring Report 35

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC). 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)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary Treated Wood Manufacturing Plant.

Source Address:	2525 Prairieton Road,, Terre Haute, Indiana 47808
Mailing Address:	2525 Prairieton Road,, Terre Haute, Indiana 47808
General Source Phone Number:	812-232-2384
SIC Code:	2491, 2865
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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) natural gas-fired boiler, identified as Boiler A, Wood Division, constructed in 1974, with a maximum capacity of 6.695 MMBtu per hour, with emission uncontrolled and exhausting through stack Blr-A-WD;
- (2) One (1) natural gas-fired boiler, identified as Boiler B, Wood Division, constructed in 1974, with a maximum capacity of 6.695 MMBtu per hour, with emission uncontrolled and exhausting through stack Blr-B-WD;
- (3) One (1) process still, identified as Still (totally enclosed process), constructed in 1973, with a maximum capacity of 10,000 gallons, with a natural gas 16.0 MMBtu per hour burner; and
- (4) Three (3) wood pressure-treat cylinders, identified as Cylinder 1, 2, and 3, (with cylinders 1, 2 and 3 each having a cooling cylinder), with maximum capacities of 4,327 cubic feet, 4,224 cubic feet, and 2,137 cubic feet, respectively, with emissions uncontrolled and exhausting through stacks Cyl-1, Cyl-2 and Cyl-3, respectively.

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):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

- (1) Two (2) natural gas fired boilers, identified as Boilers A and B, tar Division, constructed in 1979 with maximum heat input of 8.37 and 6.70 MMBtu per hour, respectively, with one (1) process heater [326 IAC 6-2-3].
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2];
- (c) wood Division, Tanks W - 1a through W -4a [40 CFR 40.116b, Subpart Kb];
- (d) above ground tower, identified as CT #1;
- (e) above ground separator, identified as separator #1;
- (f) resistance temperature detector, identified as TD #1;
- (g) two (2) 500,000 gallon vertical, above ground storage tanks, identified as #19 and #20, with one (1) 16,000 gallon vertical, above ground fixed roof coal tar storage tank, identified as #6 [40 CFR 60.116b, Subpart Kb]; and
- (h) the construction of an indoor cyclone dust collector system for a 1200 RPM gang drill with a 9/16 DML tool [326 IAC 6-3-2].

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);
- (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 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

-
- (a) This permit, T167-17590-00036, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and VCAPC, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

-
- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and VCAPC, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

B.5 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.6 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.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

-
- (a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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, OAQ and VCAPC on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and VCAPC 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.10 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, OAQ, and VCAPC 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 Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Vigo County Air Pollution Control phone: (812) 462-3433; fax: (812) 462-3447

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and VCAPC 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, OAQ and VCAPC by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) 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, IDEM, OAQ, or VCAPC 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.
- (c) 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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) 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.
- (e) 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).
 - (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or VCAPC has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or VCAPC has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T167-17590-00036 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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 Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 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 Operating 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)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and VCAPC 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, OAQ and VCAPC 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, OAQ and VCAPC at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and VCAPC may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and VCAPC 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). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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, OAQ and VCAPC on or before the date it is due.
- (c) 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, OAQ and VCAPC 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, OAQ and VCAPC any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by 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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- and
- Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.19 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) 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.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in 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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
 - and
 - Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807
 - 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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to

326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

(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). 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 is not considered an application form, report or compliance certification. Therefore, the notification 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 emissions increases and decreases at 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, OAQ, 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, and VCAPC 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

The application 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) 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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and VCAPC within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ and VCAPC the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) 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.2 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.

C.3 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.4 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).

C.5 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (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 Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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 applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

in writing, prior to the end of the initial 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).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do 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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-2]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location 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 VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and 326 IAC 2-3-1(mm)(2)(A)(3); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period.

The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (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, OAQ and VCAPC on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (1) One (1) natural gas-fired boiler, identified as Boiler A, Wood Division, constructed in 1974, with a maximum capacity of 6.695 MMBtu per hour, with emission uncontrolled and exhausting through stack Blr-A-WD;
- (2) One (1) natural gas-fired boiler, identified as Boiler B, Wood Division, constructed in 1974, with a maximum capacity of 6.695 MMBtu per hour, with emission uncontrolled and exhausting through stack Blr-B-WD;
- (3) Two (2) natural gas fired boilers, identified as Boilers A and B, tar Division, constructed in 1979 with maximum heat input of 8.37 and 6.70 MMBtu per hour, respectively, with one (1) process heater [326 IAC 6-2-3].

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Particulate Matter (Particulate Emission Limitations for Sources of Indirect Heating) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), particulate matter (PM) emissions from the four (4) Boilers, identified as Boiler A and B (Wood Division) and Boiler A and B (Tar Division) shall not exceed 0.6 pounds of PM per million British thermal units.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-4-3]

Pursuant to 326 IAC 7-4-3(24) (Vigo County SO₂ Emissions Limitations), the SO₂ emissions from the boilers, identified as Boiler A and B (Wood Division) and Boiler A and B (Tar Division) shall not exceed thirty-six hundredths (0.36) pounds per MMBtu.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these emission units.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (1) One (1) process still, identified as Still (totally enclosed process), constructed in 1973, with a maximum capacity of 10,000 gallons, with a natural gas 16.0 MMBtu per hour burner; and

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 Particulate Emission Limitations for Manufacturing Process [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter (PM) emissions from the Process Still shall not exceed 14.6 pounds per hour when operating at a process weight rate of 6.66 tons per hour.

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour was determined by use of the equation:

$$E = 4.10 P^{0.67}$$

Where:

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-4-3]

Pursuant to 326 IAC 7-4-3(24) (Vigo County SO₂ Emissions Limitations), the SO₂ emissions from the Process Still shall not exceed thirty-six hundredths (0.36) pounds per MMBtu.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Process Still and its control device.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Wood Division, Tanks W - 1a through W -4a [40 CFR 40.116b, Subpart Kb];
- (b) two (2) 500,000 gallon vertical, above ground storage tanks, identified as #19 and #20, with one (1) 16,000 gallon vertical, above ground fixed roof coal tar storage tank, identified as #6 [40 CFR 60.116b, Subpart Kb]; and

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.3.1 Standard of Performance for Volatile Organic liquid storage Vessels (Including petroleum Liquid Storage Vessels) [326 IAC 12-1] [40 CFR 60, Subpart Kb]

Pursuant to 40 CFR 60 Subpart Kb, the Permittee shall comply with the provisions of Standard of Performance for Volatile Organic liquid storage Vessels (Including petroleum Liquid Storage Vessels) for the storage tanks as specified as follows:

§ 60.110b Applicability and designation of affected facility.

(a) Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

§ 60.111b Definitions.

Terms used in this subpart are defined in the Act, in subpart A of this part, or in this subpart as follows:

gasoline plant means any gasoline distribution facility that has a gasoline throughput less than or equal to 75,700 liters per day. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal requirement or Federal, State or local law, and discoverable by the Administrator and any other person.

Condensate means hydrocarbon liquid separated from natural gas that condenses due to changes in the temperature or pressure, or both, and remains liquid at standard conditions.

Custody transfer means the transfer of produced petroleum and/or condensate, after processing and/or treatment in the producing operations, from storage vessels or automatic transfer facilities to pipelines or any other forms of transportation.

Fill means the introduction of VOL into a storage vessel but not necessarily to complete capacity.

Gasoline service station means any site where gasoline is dispensed to motor vehicle fuel tanks from stationary storage tanks.

Maximum true vapor pressure means the equilibrium partial pressure exerted by the volatile organic compounds (as defined in 40 CFR 51.100) in the stored VOL at the temperature equal to the highest calendar-month average of the VOL storage temperature for VOL's stored above or below the ambient temperature or at the local maximum monthly average temperature as reported by the National Weather Service for VOL's stored at the ambient temperature, as determined:

- (1) In accordance with methods described in American Petroleum institute Bulletin 2517, Evaporation Loss From External Floating Roof Tanks, (incorporated by reference—see §60.17); or
- (2) As obtained from standard reference texts; or
- (3) As determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17);
- (4) Any other method approved by the Administrator.

Petroleum means the crude oil removed from the earth and the oils derived from tar sands, shale, and coal.

Petroleum liquids means petroleum, condensate, and any finished or intermediate products manufactured in a petroleum refinery.

Process tank means a tank that is used within a process (including a solvent or raw material recovery process) to collect material discharged from a feedstock storage vessel or equipment within the process before the material is transferred to other equipment within the process, to a product or by-product storage vessel, or to a vessel used to store recovered solvent or raw material. In many process tanks, unit operations such as reactions and blending are conducted. Other process tanks, such as surge control vessels and bottoms receivers, however, may not involve unit operations.

Reid vapor pressure means the absolute vapor pressure of volatile crude oil and volatile nonviscous petroleum liquids except liquified petroleum gases, as determined by ASTM D323–82 or 94 (incorporated by reference—see §60.17).

Storage vessel means each tank, reservoir, or container used for the storage of volatile organic liquids but does not include:

- (1) Frames, housing, auxiliary supports, or other components that are not directly involved in the containment of liquids or vapors;
- (2) Subsurface caverns or porous rock reservoirs; or
- (3) Process tanks.

Volatile organic liquid (VOL) means any organic liquid which can emit volatile organic compounds (as defined in 40 CFR 51.100) into the atmosphere.

Waste means any liquid resulting from industrial, commercial, mining or agricultural operations, or from community activities that is discarded or is being accumulated, stored, or physically, chemically, or biologically treated prior to being discarded or recycled.

§ 60.116b Monitoring of operations.

(a) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source.

(b) The owner or operator of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (a) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2];
- (b) the construction of an indoor cyclone dust collector system for a 1200 RPM gang drill with a 9/16 DML tool [326 IAC 6-3-2].

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.4.1 Particulate Emission Limitation for Manufacturing Process [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the insignificant activities, brazing equipment, cutting torches, soldering equipment, and welding equipment shall be limited by the following equation:

Interpolation 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:

$$E = 4.10 P^{0.67}$$

Where:

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.4.2 Particulate Emission Limitations for Manufacturing Process [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the insignificant activities, Gang drill shall be limited by the following equation:

Interpolation 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:

$$E = 4.10 P^{0.67}$$

Where:

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.4.3 Particulate Matter (PM)

The cyclone for particulate control shall be in operation and control emissions from the gang drill operations at all times that the gang drill is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and VCAPC
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Tangent Rail Products, Inc
Source Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
Mailing Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-17590-00036

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:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- 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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

and VCAPC

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Tangent Rail Products, Inc
Source Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
Mailing Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-17590-00036

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
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: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and VCAPC**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Tangent Rail Products, Inc
Source Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
Mailing Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-17590-00036

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned 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:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and VCAPC
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Tangent Rail Products, Inc
 Source Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
 Mailing Address: 2525 Prairieton Road,, Terre Haute, Indiana 47808
 Part 70 Permit No.: T167-17590-00036

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Tangent Rail Products, Inc.
Source Location:	2525 Prairieton Road, Terre Haute, Indiana 47808
County:	Vigo
SIC Code:	2491, 2865
Permit Renewal No.:	T167-17590-00036
Permit Reviewer:	Josiah Balogun

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Tangent Rail Products, Inc relating to the operation of a treated wood manufacturing plant.

History

On March 28, 2003, Tangent Rail Products, Inc submitted applications to the OAQ requesting to renew its operating permit. Tangent Rail Products, Inc was issued a Part 70 Operating Permit Renewal on December 31, 1998.

Tangent Rail Products, Inc. was issued a Part 70 Operating permit on December 31, 1998 due to their potential to emit (PTE). The removal of all fuel types except for the natural gas combustion, have caused their PTE to decrease well below the Part 70 thresholds. The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year, therefore, 326 IAC 2-7 is not applicable to this source. However, Tangent Rail Products, Inc. has informed IDEM, OAQ that they want to remain in the Part 70 program.

Permitted Emission Units and Pollution Control Equipment

- (1) One (1) natural gas-fired boiler, identified as Boiler A, Wood Division, constructed in 1974, with a maximum capacity of 6.695 MMBtu per hour, with emissions uncontrolled and exhausting through stack Blr-A-WD;
- (2) One (1) natural gas-fired boiler, identified as Boiler B, Wood Division, constructed in 1974, with a maximum capacity of 6.695 MMBtu per hour, with emissions uncontrolled and exhausting through stack Blr-B-WD;
- (3) One (1) process still, identified as Still (totally enclosed process), constructed in 1973, with a maximum capacity of 10,000 gallons, using a natural fired-gas burner, with a maximum capacity of 16.0 MMBtu per hour; and
- (4) Three (3) wood pressure-treat cylinders, identified as Cylinder 1, 2, and 3, (with cylinders 1, 2 and 3 each having a cooling cylinder), with maximum capacities of 4,327 cubic feet, 4,224 cubic feet, and 2,137 cubic feet, respectively, with emissions uncontrolled and exhausting through stacks Cyl-1, Cyl-2 and Cyl-3, respectively.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units operating at the source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units and control equipment were removed from the source.

Insignificant Activities

The source also consists of the following insignificant activities, as defined an 326 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
 - (1) Two (2) natural gas fired boilers, identified as Boilers A and B, (Tar Division), constructed in 1979 with maximum heat input of 8.37 and 6.70 MMBtu per hour, respectively, with one (1) process heater [326 IAC 6-2-3].
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2];
- (c) Wood Division, Tanks W - 1a through W -4a [40 CFR 40.116b, Subpart Kb];
- (d) Above ground tower, identified as CT #1;
- (e) Above ground separator, identified as separator #1;
- (f) resistance temperature detector, identified as TD #1;
- (g) two (2) 500,000 gallon vertical, above ground storage tanks, identified as #19 and #20, with one (1) 16,000 gallon vertical, above ground fixed roof coal tar storage tank, identified as #6 [40 CFR 60.116b, Subpart Kb]; and
- (h) the construction of an indoor cyclone dust collector system for a 1200 RPM gang drill with a 9/16 DML tool [326 IAC 6-3-2].

Existing Approvals

Since the issuance of the Part 70 Operating Permit T167-5971-00036 on December 31, 1998, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment T167-11366-00036, issued on December 31, 1999;
- (b) Minor Source Modification T167-11754-00036, issued on February 24, 2000;
- (c) Minor Source Modification T167-11855-00036, issued on April 20, 2000;;
- (d) Administrative Amendment T167-11950-00036, issued on April 25, 2000;
- (e) Administrative Amendment T167-12458-00036, issued on July 25, 2000; and
- (f) Administrative Amendment T167-19261-00036, issued on June 28, 2004;

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Blr-A-WD	31	2	1145	380
Blr-B-WD	31	2	1145	382
Blr -A-TAR	22.5	1.5	1145	379
Blr -B-TAR	31	2	1172	385

Emission Calculations

See Appendix A of this document for detailed emission calculations (1 through 12).

County Attainment Status

The source is located in Vigo County

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Vigo County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Vigo County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.3
PM-10	1.4
SO ₂	0.5
VOC	29.6
CO	16.3
NO _x	19.5
Pb	less than 10

HAPs	tons/year
Benzene	less than 10
Dichlorobenzene	less than 10
Formaldehyde	less than 10
Hexane	less than 10
Toluene	less than 10
Benzyl Alcohol	less than 10
Lead	less than 10
Cadmium	less than 10
Chromium	less than 10
manganese	less than 10
Nickel	less than 10
Total	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006

Pollutant	Actual Emissions (tons/year)
PM	NA
PM-10	3
SO ₂	0
VOC	7
CO	3
NO _x	3
Pb	0

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Units	Potential to Emit						
	PM (ton/yr)	PM ₁₀ (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)	HAPs (ton/yr)
Boiler A and B (Wood Div)	0.1	0.4	0.04	0.3	4.9	5.9	0.11
Boiler A and B (Tar Div)	0.1	0.5	0.04	0.4	5.5	6.6	0.12
Process Still	0	0	0	11.7	0	0	6.13
Still (Combustion)	0.1	0.5	0.4	0.4	5.9	7	0.13
Cylinders (1, 2 and 3)	0	0	0	1.5	0	0	0.002
Two (2) Storage tanks	0	0	0	2.43	0	0	0
Treated Wood Storage	0	0	0	2.04	0	0	0.003
API Separator	0	0	0	3.71	0	0	0
Oil-Water Separator	0	0	0	3.71	0	0	0
Equipment Leaks	0	0	0	3.38	0	0	1.99
Total Emissions	0.3	1.4	0.5	29.6	16.3	19.5	8.5

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Units	Control Device Used	Emission Limitaion (Y/N)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Major Source Threshold (tons/yr)	CAM Applicability (Y/N)	Large Unit (Y/N)
Boiler A (Wood Div) PM10	N	N	0.2	0.2	100	N	N
Boiler B (Wood Div) PM10	N	N	0.2	0.2	100	N	N
Boiler A (Tar Div) PM10	N	N	0.3	0.3	100	N	N
Boiler B (Tar Div) PM10	N	N	0.2	0.2	100	N	N
Process Still PM 10	Y	N	0.1	0.1	100	N	N
Boiler A (Wood Div) SO2	N	N	0.02	0.02	100	N	N
Boiler B (Wood Div) SO2	N	N	0.02	0.02	100	N	N
Boiler A (Tar Div) SO2	N	N	0.02	0.02	100	N	N
Boiler B (Tar Div) SO2	N	N	0.02	0.02	100	N	N
Process Still SO2	N	N	0.4	0.4	100	N	N
Boiler A (Wood Div) VOC	N	N	0.2	0.2	100	N	N

Emission Units	Control Device Used	Emission Limitaion (Y/N)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)	Major Source Threshold (tons/yr)	CAM Applicability (Y/N)	Large Unit (Y/N)
Boiler B (Wood Div) VOC	N	N	0.2	0.2	100	N	N
Boiler A (Tar Div) VOC	N	N	0.2	0.2	100	N	N
Boiler B (Tar Div) VOC	N	N	0.2	0.2	100	N	N
Process Still VOC	N	N	0.4	0.4	100	N	N
Cylinders VOC	N	N	1.5	1.5	100	N	N
Storage tanks VOC	N	N	2.43	2.43	100	N	N
Treated Wood Storage VOC	N	N	2.04	2.04	100	N	N
API Separator VOC	N	N	3.71	3.71	100	N	N
Oil-Water Separator VOC	N	N	3.71	3.71	100	N	N
Equipment Leaks VOC	N	N	3.38	3.38	100	N	N
Boiler A (Wood Div) CO	N	N	2.5	2.5	100	N	N
Boiler B (Wood Div) CO	N	N	2.5	2.5	100	N	N
Boiler A (Tar Div) CO	N	N	3.1	3.1	100	N	N
Boiler B (Tar Div) CO	N	N	2.5	2.5	100	N	N
Boiler A (Wood Div) NOx	N	N	2.9	2.9	100	N	N
Boiler B (Wood Div) NOx	N	N	2.9	2.9	100	N	N
Boiler A (Tar Div) NOx	N	N	3.7	3.7	100	N	N
Boiler B (Tar Div) NOx	N	N	2.9	2.9	100	N	N
Process Still NOx	N	N	7	7	100	N	N
Boiler A (Wood Div) HAP	N	N	single <10, Total <25	0.05	10/25	N	N
Boiler B (Wood Div) HAP	N	N	single <10, Total <25	0.05	10/25	N	N
Boiler A (Tar Div) HAP	N	N	single <10, Total <25	0.066	10/25	N	N
Boiler B (Tar Div) HAP	N	N	single <10, Total <25	0.05	10/25	N	N
Process Still HAP	N	N	single <10, Total <25	6.26	10/25	N	N
Cylinders HAP	N	N	single <10, Total <25	0.002	10/25	N	N
Treated Wood Storage HAP	N	N	single <10, Total <25	0.003	10/25	N	N
Equipment Leaks HAP	N	N	single <10, Total <25	1.99	10/25	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc, 326 IAC 12) are not included in the permit for boilers identified as Boilers A and B (Wood division) and Boilers A and B (Tar division) because these boilers were constructed prior to June 9, 1989 and each has a heat input capacity less than 10 MMBtu per hour.
- (b) The requirements of the New Source Performance Standard for Standard of Performance for Volatile Organic liquid storage Vessels (Including petroleum Liquid Storage Vessels (40 CFR 60, Subpart Kb, 326 IAC 12) are included in the permit for the six (6) storage tanks, identified as W-1a, W-2a, W-3a, W-4a, #19, and #20 because they have a storage capacity of greater or equal to 75 cubic meters.

Nonapplicable portion of the NSPS will not be included in the permit. These emission units are subject to the following portions of Subpart Kb:

- (1) 40 CFR 60.110b (a);
 - (2) 40 CFR 60.111b; and
 - (3) 40 CFR 60.116b (b).
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant deterioration)

This source was constructed before August 1977, the applicability date for this rule and at that time it has the potential to emit PM and all other regulated pollutants of less than 250 tons per year. Modifications to this source have been below major modification levels and it is not one of the twenty-eight (28) listed sources. Therefore the source is not major for PSD purposes.

326 IAC 2-6 (Emission Reporting)

The source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall triennially submit an emission statement for the source beginning in 2006 and every three years thereafter. The statement must be received by July 1 and contain the minimum requirements as specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6-3(a).

326 IAC 5-1 (Opacity Limitations)

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 the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) 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.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter (PM) emissions from the Process Still shall not exceed 14.6 pounds per hour when operating at a process weight rate of 6.66 tons per hour.

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour was determined by use of the equation:

$$E = 4.10 P^{0.67}$$

Where:

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the insignificant activities, brazing equipment, cutting torches, soldering equipment, and welding equipment shall be limited by the following equation:

Interpolation 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:

$$E = 4.10 P^{0.67}$$

Where:

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the insignificant activities, Gang drill shall be limited by the following equation:

Interpolation 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:

$$E = 4.10 P^{0.67}$$

Where:

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The cyclone for PM control from the gang drill shall be in operation at all times the gang drill is in operation.

326 IAC 8-4-3 (Petroleum Liquid storage facilities)

Pursuant to 326 IAC 8-4-3, the two (2) storage tanks have a vapour pressure of less than 1.52 psi. Therefore, the requirements of 326 IAC 8-4-3 is not applicable to these emission units.

326 IAC 6-2-3 (Particulate Emission Limitations for Source of Indirect Heating)

The four natural gas fired boilers, identified as Boiler A and B (Wood Division) and Boiler A and B (tar Division) were constructed before the applicability date of 1983. Pursuant to 326 IAC 6-2-3(e), the particulate emissions from the boilers which were in operation after June 8, 1972 shall not exceed 0.6 lbs/MMBtu.

The PM limit was calculated using the equation below:

$$\begin{aligned} \text{Pt} &= \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} \\ &= 0.72 \text{ lb/MMBtu/hr} \end{aligned}$$

Where:

- C = 50 u/m³
- Pt= pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)
- Q = 28.46 total source maximum operating capacity rating (MMBtu/hr)
- N = (4) number of stacks
- a = plume rise factor (0.67)
- h = 28.5 stack height (ft)

Pursuant to 326 IAC 6-2-3(e), PM emissions from the boilers, identified as Boiler A and B (Wood and Tar Division) shall not exceed 0.6 lbs/MMBtu heat input

326 IAC 6.5-1-2 (Particulate Matter Limitations)

Since Vigo County remains listed under 326 IAC 6.5-1-7 (formerly 326 IAC 6-1-7), all sources within it might be subject to the requirements of 326 IAC 6.5-1-2. However, Tangent Rail Products, Inc. is not specifically listed in 326 IAC 6.5-9 and does not have either potential emissions of particulate matter above one hundred (100) tons per year, or actual emissions above ten (10) tons per year. Therefore, the boilers shall be regulated by 326 IAC 6-2 and the STILL process shall be regulated by 326 IAC 6-3-2.

326 IAC 7-4-3 (Vigo County SO₂ Emissions Limitations)

- (a) Pursuant to 326 IAC 7-4-3(24) (Vigo County SO₂ Emissions Limitations) the SO₂ emissions from the boilers A and B (Tar and Wood Division), shall not exceed thirty-six hundredths (0.36) pounds per MMBtu heat input, for each boiler.
- (b) Pursuant to 326 IAC 7-4-3(24) (Vigo County SO₂ Emissions Limitations) the SO₂ emissions from the Still, shall not exceed thirty-six hundredths (0.36) pounds per MMBtu heat input.

326 IAC 8-1-6 (Best Available Control Technology)

The wood treatment process and the pressure-treat cylinders were constructed in 1950, prior to the January 1, 1980 applicability date for this rule. Therefore, the wood treatment process and the pressure-treat cylinders are not subject to the requirements of 326 IAC 8-1-6.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal 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 application for the purposes of this review was received on March 28, 2003

Conclusion

The operation of this treated wood manufacturing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No T 167-17590-00036.

Appendix A: Emissions Calculations**Emission Summary**

Source Name: Tangent Rail Products, Inc
Source Location: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Permit Reviewer: Josiah Balogun
Date: 25-Oct-2007

Uncontrolled Potential Emissions

	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Boiler A and B (Wood Div)	0.1	0.4	0.04	0.3	4.9	5.9	0.11
Boiler A and B (Tar Div)	0.1	0.5	0.04	0.4	5.5	6.6	0.12
Process Still	0	0	0	11.7	0	0	6.13
Still (Combustion)	0.1	0.5	0.4	0.4	5.9	7	0.13
Cylinder (1, 2 and 3)	0	0	0	1.5	0	0	0.002
Two (2) Storage tanks	0	0	0	2.43	0	0	0
Treated Wood Storage	0	0	0	2.04	0	0	0.003
API Separator	0	0	0	3.71	0	0	0
Oil - Water Separator	0	0	0	3.71	0	0	0
Equipment Leaks	0	0	0	3.38	0	0	1.99
Total Emissions	0.3	1.4	0.5	29.6	16.3	19.5	8.5

Appendix A: Emissions Calculations
Emission Summary

Source Name: Tangent Rail Products, Inc
Source Location: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Permit Reviewer: Josiah Balogun
Date: 25-Oct-2007

Limited Potential Emissions

	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Boiler A and B (Wood Div)	0.1	0.4	0.04	0.3	4.9	5.9	0.11
Boiler A and B (Tar Div)	0.1	0.5	0.04	0.4	5.5	6.6	0.12
Process Still	0	0	0	11.7	0	0	6.13
Still (Combustion)	0.1	0.5	0.4	0.4	5.9	7	0.13
Cylinder (1, 2 and 3)	0	0	0	1.5	0	0	0.002
Two (2) Storage tanks	0	0	0	2.43	0	0	0
Treated Wood Storage	0	0	0	2.04	0	0	0.003
API Separator	0	0	0	3.71	0	0	0
Oil - Water Separator	0	0	0	3.71	0	0	0
Equipment Leaks	0	0	0	3.38	0	0	1.99
Total Emissions	0.3	1.4	0.5	29.6	16.3	19.5	8.5

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Boiler A and B Wood Division

Company Name: Tangent Rail Products, Inc
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

13.4

117.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0 **see below	5.5	84.0
	0.1	0.4	0.04	5.9	0.3	4.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Boiler A and B Wood Division

HAPs Emissions

Company Name: Tangent Rail Products, Inc
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.232E-04	7.038E-05	4.399E-03	1.056E-01	1.994E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.932E-05	6.451E-05	8.211E-05	2.229E-05	1.232E-04

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Boiler A and B Tar Division

Company Name: Tangent Rail Products, Inc
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

15.1

132.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0 **see below	5.5	84.0
	0.1	0.5	0.04	6.6	0.4	5.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Boiler A and B Tar Division

HAPs Emissions

Company Name: Tangent Rail Products, Inc
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.386E-04	7.921E-05	4.950E-03	1.188E-01	2.244E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.300E-05	7.261E-05	9.241E-05	2.508E-05	1.386E-04

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Process Still Combustion Unit

Company Name: Tangent Rail Products, Inc
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

16.00

140.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.5	0.04	7.0	0.4	5.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 8 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Process Still Combustion Unit

HAPs Emissions

Company Name: Tangent Rail Products, Inc

Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808

Permit Number: T167-17950-00036

Reviewer: Josiah Balogun

Date: 25-Oct-2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.472E-04	8.410E-05	5.256E-03	1.261E-01	2.383E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.504E-05	7.709E-05	9.811E-05	2.663E-05	1.472E-04

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Emission Calculations from the Two (2) 500,000 gallon crude Coal tar storage Tanks
HAPs Emissions**

Company Name: Tangent Rail Products, Inc
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17950-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

Working Losses:

Lw = fixed roof working loss (lb/yr)
Mv = molecular weight of vapor in storage tanks (lb/lb mole), 172 g/mole
P = true vapor pressure at bulk liquid temperature (psia), 0.006 psia
V = tank capacity (gal), 500,000 gal
N = number of turnover factor (dimensionless), 2
KN = turnover factor (dimensionless), 1.0
KC = product factor (dimensionless), 1.0

Lw = $2.4E-5 (Mv) (P) (V) (N) (KN) (KC)$
Lw = 24.77lb/yr

Breathing Loss:

Lb = fixed roof breathing loss (lb/year)
Mv = molecular weight of vapor in storage tank (lb/lb mole), 172 g/mole
Pa = average atmospheric pressure at tank location (psia) at indianapolis, 14.7 psia
P = true vapor pressure at bulk liquid temperature (psia), 0.006 psia
D = Tank diameter (ft) 52ft
H = average vapor space height, including roof volume correction (ft)
Change T = average ambient diurnal temperature change (deg. F), 20 oF
Fp = paint factor
C = adjustment factor for small diameter tanks
KC = product factor (dimensionless), 1.0

Lb = $2.26E-2(Mv) (P/(pa-P)^{0.68}) (D)^{1.73} (H)^{0.51} (Change\ T)^{0.5} (Fp) (KC)$
Lb = 461.91lb/yr

Total Loss, LT:

LT = $(24.77 + 461.91) \times 5$
LT = 2433.4 lb/yr each

Total, LT = 4866.8 lb/yr
Total, LT = 2.43 ton/yr

Still

Company Name: Tangent Rail Products, Inc.
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17590-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

Still Operations:

PTE, assuming 100% of Crude Coal Tar is volatile and that the still has no control = 70 pounds/hour (determined by 1992 RACT study).
In actuality, 38% of Crude Coal Tar is volatile. Due to the fact that the Still is totally enclosed, we estimate a 90% control efficiency (control efficiency determined by 1992 RACT study).

Therefore:

VOC = (70 lb/hr) X (0.38)
VOC = 26.6 lb/hr

Enclosed vessel VOC = (26.6 lb/hr) X (1-0.90)

Enclosed vessel VOC = 2.66 lb/hr

Enclosed vessel VOC = 11.7 ton/yr

Appendix A: Emissions Calculations

Cylinders (C1, C2, and C3)

Company Name: Tangent Rail Products, Inc.
 Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
 Permit Number: T167-17590-00036
 Reviewer: Josiah Balogun
 Date: 25-Oct-2007

Actual Charge Volume = 1960 cubic feet (C1)
 Actual Charge Volume = 2306 cubic feet (C2)
 Actual Charge Volume = 1268 cubic feet (C3)

Operating temperature = 190 F

Conversion to K = $190 - 32 \times (0.55) + 273.15$
 Conversion to K = 360 K

Average Charge Volume = 1844.6667 cubic feet/charge

EPA Test results from Avoca, Penn indicate retort door emissions to average 5.917 pounds per hour of creosote (VOC's) per hour at a facility with a retort volume of 5773 cubic feet and operated at a temperature of 180 F.

Average retort length = $\frac{150 \text{ feet (C1)} + 176 \text{ feet (C2)} + 96 \text{ feet (C3)}}{3}$

R = 5.917 lbs/hr

Average retort length = 141 feet

Average retort diameter = $\frac{6 \text{ feet (C1)} + 6 \text{ feet (C2)} + 6 \text{ feet (C3)}}{3}$

Average retort diameter = 6 feet

Average retort volume = $(L) \times (D)^2 \times 3.142/4$

Average retort volume = $(141 \text{ feet}) \times (6 \text{ feet} \times 6 \text{ feet}) \times (3.142/4)$

Average retort volume = 3987 cubic feet

Emission Rate = $[(5.917 \text{ lb/hr}) \times (3987 \text{ ft}^3/5773 \text{ ft}^3)] \times [\text{EXP}(-6027.5809/361 + 16.961317)]$

{derived from vapor pressure of crosote oil}

Emission Rate = 5.36 lb/hr

Total Emissions = $(30 \text{ min/charge}) \times (1 \text{ hr}/60 \text{ min}) \times (1095 \text{ charges/year}) \times (5.36 \text{ lb/hr})$

Total Emissions = 2902 lbs/yr

Total Emissions = 1.5 tons/yr

Appendix A: Emissions Calculations

HAP calculations
Company Name: Tangent Rail Products, Inc.
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17590-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

HAP Calculations for the Still

Note: Total % by Weight for all chemicals = 100%. Total Non-VOC chemicals = 62%.
 Total % by Weight for all chemicals that are VOC = 38%.

CAS #	HAPs Chemical	%	CAS #	Polylic Organic Matter	%
56553	Benzo (a) anthracene	1.2	83329	Acenaphthene	1
50328	Benzo (a) Pyrene	0.1	208968	Acenaphthylene	2
205992	Benzo(B) Fluoroanthene	0.01	120127	Anthracene	2
191242	Benzo(ghi)Perylene	0.01	56553	Benzo (a) anthracene	1.2
207089	Benzo (k) Fluoranthene	0.001	50328	Benzo (a) Pyrene	0.1
218019	Chrysene	0.01	205992	Benzo(B) Fluoroanthene	0.01
95487	o-Cresol	0.25	191242	Benzo(ghi)Perylene	0.01
108394	m-Cresol	0.45	207089	Benzo (k) Fluoranthene	0.001
106445	p-Cresol	0.5	218019	Chrysene	0.01
53703	Dibenz (a,h) anthracene	0.1	53703	Dibenz (a,h) anthracene	0.1
132649	Dibenzofuran	1	206440	Fluoranthene	1
100414	Ethylbenzene	0.5	86737	Fluorene	1
206440	Fluoranthene	1	193395	Indeno (1,2,3-cd)pyrene	0.4
86737	Fluorene	1	91203	Napthalene	7
193395	Indeno (1,2,3-cd)pyrene	0.4	85018	Phenanthrene	5
91203	Napthalene	7	129000	Pyrene	2.5
85018	Phenanthrene	5		Total	23.3
108952	Phenol	1			
129000	Pyrene	2.5			
100425	Styrene	1			
108883	Toluene	2			
1330207	Xylene	4			29.1
107028	Acrolein	0.02			<u>23.3</u>
	Total	29.1		Combined Total	= 52.4

Still:

Potential emissions:
 Uncontrolled Still = 70 pounds/hr
 VOC in Crude Coal Tar = 38%

Total VOC in Crude Coal Tar = 70 lbs/hr X 0.38 = 26.6 lbs/hr

Still is a closed vessel, it has at least 90% control due to the fact that it has a closed vessel and has no stack.

Total VOC 's from Still = 26.6 lbs/hr X (1-0.90) = 2.66 lbs/hr
 PTE = 2.66 lbs/hr X 8760 hrs/yr X 1 ton/2000 lbs = 11.7 tons/yr

Therefore, total HAP's from Still = 52.4% X 11.7 = 6.13 tons/yr

HAP Calculations

Company Name: Tangent Rail Products, Inc.
 Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
 Permit Number: T167-17590-00036
 Reviewer: Josiah Balogun
 Date: 25-Oct-2007

HAP Calculations for the Equipment Leaks

Equipment

Leaks: 3.38 TPY VOC
 38 % HAP

Therefore, total HAP's from the Equipment Leaks = (52.4%/100) X 3.8 TPY VOC = 1.99 TPY HAP's

HAP Calculations for the Cylinders

CAS #	HAPs Chemical	%
Benzyl Alcohol		
108394	m-Cresol	0.0349
106445	p-Cresol	0.0349
N-Nitroso-n-propylamine 2,4-Dimethylphenol		
91203	Napthalene	0.00011
2-Chloronapthalene		
208968	Acenaphthylene	0.00007
83329	Acenaphthene	0.0045
NA	4-Nitrophenol	0.00011
Phenacetin		
120127	Anthracene	0.0564
56553	Benzo (a) anthracene	0.0076
218019	Chrysene	0.0023
NA	Benzo (b) Fluoranthene	0.0018
207089	Benzo (k) Fluoranthene	0.0053
193395	Indeno (1,2,3-cd)pyrene	0.00046
53703	Dibenz (a,h) anthracene	0.00026
191242	Benzo(ghi)Perylene	0.00029
	Total	0.149

Cylinders 1, 2, 3:

1.5 TPY VOC
 38 % HAP

HAP's from Cylinders = (0.149%/100) X 1.5 TPY VOC = 0.002 TPY HAP's

HAP Calculations for the Treated Wood Storage

Treated Wood

Storage: 2.04 TPY VOC
 38 % HAP

HAP's from Treated Wood Storage = (0.149%/100) X 2.04 TPY VOC = 0.003 TPY HAP's

Appendix A: Emissions Calculations

Company Name: Tangent Rail Products, Inc.
Address City IN Zip: 2525 Prairieton Road, Terre Haute, Indiana 47808
Permit Number: T167-17590-00036
Reviewer: Josiah Balogun
Date: 25-Oct-2007

Given:

10000 pounds per batch
 10.65 pounds per gallon
 8 hours per batch
 3 batches per day

326 IAC 6-3-1 indicates an allowable emission rate using the following equation:

$$E = 4.10P^{0.67}$$

Where:

E = the rate of emissions in pounds per hour; and
 P = the process weight rate in tons per hour

$$P = \frac{10000 \text{ gal}}{8 \text{ hrs.}} \times \frac{10.65 \text{ lbs.}}{\text{gal}} \times \frac{\text{ton}}{2000 \text{ lbs.}} = 6.66 \frac{\text{ton}}{\text{hr}}$$

$$E = 4.10P^{0.67}$$

$$E = 4.10 \times (6.66 \text{ ton/hr})^{0.67}$$

$$E = 14.6 \text{ lbs./hr}$$