



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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August 13, 2004

William E. Solt
Stanrail Corporation
1225 Martin Luther King Drive
Gary, Indiana 46402

Re: Registered Construction and Operation Status,
089-18519-00406

Dear Mr. Solt:

The application from Stanrail Corporation, received on December 18, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following railroad car surface coating and welding source, to be located at 1225 Martin Luther King Drive, Gary, Indiana, 46402, is classified as registered:

- (a) One (1) dip tank located in the paint drying room, identified as Line 1 dip tank, installed in 1991, capacity: forty-seven (47) steel floor channels per hour or 3,525 pounds of steel flooring per hour.
- (b) One (1) dip tank located in the paint drying room, identified as Line 2 dip tank, installed in 1995, capacity: twenty-six (26) uncoupling levers per hour or 1,196 pounds of uncoupling levers per hour.
- (c) One (1) dip tank located in the paint drying room, identified as Line 3 dip tank, installed in 1995, capacity: forty-seven (47) steel floor channels per hour or 3,525 pounds of steel flooring per hour.
- (d) One (1) air atomization paint spray room, identified as Line 5 spray room, installed in 1999, equipped with a dry filter system for particulate control, exhausting to Stack 5, capacity: sixteen (16) flat floor pieces per hour or 4,000 pounds of steel parts per hour.
- (e) One (1) conveyer line, identified as Line 1, installed in 1995, equipped with Line 1 dip tank, Line 1 welding station and a welding smoke collector, capacity: 3,525 pounds of steel parts per hour.
- (f) One (1) conveyer line, identified as Line 2, installed in 1995, equipped with Line 2 dip tank, capacity: 1,195 pounds of steel parts per hour.
- (g) One (1) conveyer line, identified as Line 3, installed in 1995, equipped with Line 3 dip tank, Line 3 welding station and a welding smoke collector, capacity: 3,525 pounds of steel parts per hour.
- (h) One (1) conveyer line, identified as Line 5, installed in 1999, equipped with Line 5 spray room and a welding smoke collector, capacity: 4,000 pounds of steel parts per hour.
- (i) One (1) welding station, identified as Line 1 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: twelve (12) pounds of wire per hour, each.
- (j) One (1) welding station, identified as Line 3 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: five (5) pounds of wire per hour, each.
- (k) One (1) electric resistance welder, installed in 2000.
- (l) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) flame cutting torches, installed in 2001, capacity: less than or equal to 1.125 inch thick steel cut at eighteen (18) inches per minute.
- (m) One (1) rollform area, installed in 1996, consisting of:
 - (1) Two (2) rollformers equipped with electric motors;

- (2) Two (2) cutoff presses with capacities of 150 tons and 200 tons; and
- (3) Uncoilers.
- (n) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.
- (o) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (p) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (q) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,500 gallons of propylene.

The following conditions shall be applicable:

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 twenty percent (20%) 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.
2. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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).

3. Any change or modification which may increase the potential to emit a combination of HAPs, VOC, PM or PM₁₀ to twenty five (25) tons per year or a single HAP to ten (10) tons per year from this source shall require approval from IDEM, OAQ prior to making the change.

4. Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate from the one (1) air atomization paint spray room, identified as Line 5 spray room, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

5. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the one (1) dip tank, identified as Line 1 dip tank, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the Line 1 dip tank is in compliance with this requirement.

6. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the one (1) dip tank, identified as Line 3 dip tank, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the Line 3 dip tank is in compliance with this requirement.

7. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the one (1) air atomization spray room, identified as Line 5 spray room, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the Line 5 spray room is in compliance with this requirement.

8. Pursuant to 326 IAC 8-9-1(b) (Volatile Organic Liquid Storage Vessels), the one (1) propylene storage tank, identified as WS-3, is subject to the record keeping and reporting requirements of 326 IAC 8-9-6(a) and (b) because the one (1) propylene storage tank has a storage capacity less than 39,000 gallons, stores volatile organic liquid and is located in Lake County. Therefore, the following records shall be maintained for the life of the one (1) propylene storage tank:

- (a) The vessel identification number.
- (b) The vessels dimensions.
- (c) The vessel capacity.

This registration is a revised registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

SAR-MLK/MES

cc: File - Lake County
Lake County Health Department
Air Compliance - Rick Massoels / Ramesh Tejuja
Northwest Regional Office
Permit Tracking
Compliance Data Section
Gary Department of Environmental Affairs

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	Stanrail Corporation
Address:	1225 Martin Luther King Drive
City:	Gary, Indiana
Authorized individual:	William E. Solt
Phone #:	219-932-5200
Registration #:	R 089-18519-00406

I hereby certify that Stanrail Corporation is still in operation and is in compliance with the requirements of Registration 089-18519-00406.

Name (typed):
Title:
Signature:

Date:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Stanrail Corporation
Source Location:	1225 Martin Luther King Drive, Gary, Indiana 46402
County:	Lake
SIC Code:	3743
Operation Permit No.:	089-18519-00406
Permit Reviewer:	Stephanie A. Roy/Mark L. Kramer

The Office of Air Quality (OAQ) has reviewed an application from Stanrail Corporation relating to the operation of a railroad car surface coating and welding source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) dip tank located in the paint drying room, identified as Line 1 dip tank, installed in 1991, capacity: forty-seven (47) steel floor channels per hour or 3,525 pounds of steel flooring per hour.
- (b) One (1) dip tank located in the paint drying room, identified as Line 2 dip tank, installed in 1995, capacity: twenty-six (26) uncoupling levers per hour or 1,196 pounds of uncoupling levers per hour.
- (c) One (1) dip tank located in the paint drying room, identified as Line 3 dip tank, installed in 1995, capacity: forty-seven (47) steel floor channels per hour or 3,525 pounds of steel flooring per hour.
- (d) One (1) air atomization paint spray room, identified as Line 5 spray room, installed in 1999, equipped with a dry filter system for particulate control, exhausting to Stack 5, capacity: sixteen (16) flat floor pieces per hour or 4,000 pounds of steel parts per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (e) One (1) conveyer line, identified as Line 1, installed in 1995, equipped with Line 1 dip tank, Line 1 welding station and a welding smoke collector, capacity: 3,525 pounds of steel parts per hour.
- (f) One (1) conveyer line, identified as Line 2, installed in 1995, equipped with Line 2 dip tank, capacity: 1,195 pounds of steel parts per hour.
- (g) One (1) conveyer line, identified as Line 3, installed in 1995, equipped with Line 3 dip tank, Line 3 welding station and a welding smoke collector, capacity: 3,525 pounds of steel parts per hour.

- (h) One (1) conveyer line, identified as Line 5, installed in 1999, equipped with Line 5 spray room and a welding smoke collector, capacity: 4,000 pounds of steel parts per hour.
- (i) One (1) welding station, identified as Line 1 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: twelve (12) pounds of wire per hour, each.
- (j) One (1) welding station, identified as Line 3 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: five (5) pounds of wire per hour, each.
- (k) One (1) electric resistance welder, installed in 2000.
- (l) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) flame cutting torches, installed in 2001, capacity: less than or equal to 1.125 inch thick steel cut at eighteen (18) inches per minute.
- (m) One (1) rollform area, installed in 1996, consisting of:
 - (1) Two (2) rollformers equipped with electric motors;
 - (2) Two (2) cutoff presses with capacities of 150 tons and 200 tons; and
 - (3) Uncoilers.
- (n) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.
- (o) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (p) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (q) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,500 gallons of propylene.

Pursuant to 326 IAC 2-1.1-3(e) (Exemptions), the four (4) conveyer lines, two (2) welding stations, one (1) electric resistance welder, one (1) oxyacetylene burning machine, one (1) rollform area and source-wide storage tanks are all exempt from permitting.

New Emission Units and Pollution Control Equipment

There are no new emission units proposed for this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

- (a) CP 089-2877-00406 issued on April 14, 1994;
- (b) R 089-4672-00158 issued on August 2, 1995; and
- (c) CP 089-10199-00406 issued on April 28, 1999.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Stack 5	Line 5 spray room	15.0	2.50	8,000	Ambient

Recommendation

The staff recommends to the Commissioner that the operation 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 December 18, 2003, with additional information received on May 7, June 14 and June 17, 2004.

Emission Calculations

See Appendix A, pages 1 through 3 of 3, of this document for detailed emission calculations.

There are no emissions associated with the one (1) electric resistance welder, one (1) rollform area or with the source-wide storage tanks.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	13.7
PM ₁₀	13.7
SO ₂	0.00
VOC	15.9
CO	0.00
NO _x	0.00

HAPs	Potential to Emit (tons/yr)
Manganese	0.075
Total	0.075

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM₁₀ is greater than five (5) tons per year and less than twenty-five (25) tons per year, and the potential to emit VOC is greater than 10 tons per year and less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Primary Nonattainment
NO ₂	Attainment
1-Hour Ozone	Severe Nonattainment
8-Hour Ozone	Moderate Nonattainment
CO	Maintenance Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_x threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (2) VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x

emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) Lake County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	2.88
PM ₁₀	2.88
SO ₂	0.00
VOC	15.9
CO	0.00
NO _x	0.00
Single HAP	0.075
Combination HAPs	0.075

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater and it is not in one of the 28 listed source categories.
- (b) The emissions were based on the Registration application submitted by the source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this Registration 089-18519-00406, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than twenty-five (25) tons per year for Lake County,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) the combination of HAPs is less than twenty-five (25) tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) This source is not subject to the requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels) because each of the four (4) storage vessels have a storage capacity less than 75 cubic meters.
- (b) This source is not subject to the requirements of 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) because the source is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential to emit from this source is less than 250 tons per year of any pollutant and it is not one of the 28 sources listed under 326 IAC 2-2. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

- (a) The one (1) conveyer line, identified as Line 5, consisting of the one (1) air atomization paint spray room identified as Line 5 spray room, the one (1) electric resistance welder, the source-wide storage tanks and the one (1) oxyacetylene burning machine were installed after July 27, 1997. The potential to emit of these facilities for any single HAP is less than ten (10) tons per year and the potential to emit from any combination of HAPs is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply to these facilities.
- (b) All remaining equipment were installed prior to July 27, 1997 and are therefore not subject to the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).

326 IAC 2-6 (Emission Reporting)

Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee will not be required to submit an emission statement because it is not a Title V source.

326 IAC 5-1 (Opacity Limitations)

Since the source is located to the west of I-65 and to the north of U.S. 30 in Lake County, 326 IAC 5-1-1(c)(4) applies. Therefore, 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 twenty percent (20%) 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This rule requires the source 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).

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake County)

The source is not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake County) because the source has the potential to emit VOC less than twenty five (25) tons per year.

State Rule Applicability – Individual Facilities

326 IAC 6-1 (County Specific Particulate Matter Limitations)

This source is not subject to the requirements of 326 IAC 6-1 (County Specific Particulate Matter Limitations) because the source has actual particulate matter emissions of less than ten (10) tons per year.

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

- (a) Particulate from the one (1) air atomization paint spray room, identified as Line 5 spray room, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) Pursuant to 326 IAC 6-3-1(b)(5), the three (3) dip tanks identified as Line 1 dip tank, Line 2 dip tank and Line 3 dip tank are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because these facilities use dip coating to apply surface coating materials.
- (c) Pursuant to 326 IAC 6-3-1(b)(9), the two (2) welding stations, identified as Line 1 welding station and Line 2 welding station, each consisting of two (2) MIG welders, are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because each facility consumes less than 625 pounds of rod or wire per day.
- (d) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) oxyacetylene burning machine is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for

Manufacturing Processes) because the one (1) oxyacetylene burning machine has potential particulate matter emissions less than 0.551 pounds per hour.

- (e) The one (1) rollform area is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the one (1) rollform area does not have the potential to emit particulate matter.
- (f) The one (1) electric resistance welder is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because one (1) electric resistance welder does not have the potential to emit particulate matter.
- (g) The source-wide storage tanks are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the source-wide storage tanks do not have the potential to emit particulate matter.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Pursuant to 326 IAC 8-2-9(a)(4), the one (1) dip tank, identified as Line 2 dip tank, constructed after July 1, 1990, is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the Line 2 dip tank has potential emissions less than fifteen (15) pounds of VOC per day before add-on controls.
- (b) The one (1) dip tank, identified as Line 1 dip tank, constructed after July 1, 1990, has the unrestricted potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the Line 1 dip tank is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the Line 1 dip tank shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the Line 1 dip tank is in compliance with this requirement.

- (c) The one (1) dip tank, identified as Line 3 dip tank, constructed after July 1, 1990, has the unrestricted potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the Line 3 dip tank is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the Line 3 dip tank shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the Line 3 dip tank is in compliance with this requirement.

- (d) The one (1) air atomization paint spray room, identified as Line 5 spray room, constructed after July 1, 1990, has the unrestricted potential to emit greater than fifteen (15) pounds

of VOC per day. Therefore, the Line 5 spray room is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the Line 5 spray room shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the Line 5 spray room is in compliance with this requirement.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1(b), the one (1) propylene storage tank, identified as WS-3, is subject to the record keeping and reporting requirements of 326 IAC 8-9-6(a) and (b) because the one (1) propylene storage tank has a storage capacity less than 39,000 gallons, stores volatile organic liquid and is located in Lake County. Therefore, the following records shall be maintained for the life of the one (1) propylene storage tank:

- (a) The vessel identification number.
- (b) The vessels dimensions.
- (c) The vessel capacity.

Conclusion

The operation of this railroad car surface coating and welding source shall be subject to the conditions of the Registration 089-18519-00406.

Appendix A: Emissions Calculations

Welding and Thermal Cutting

Company Name: Stanrail Corporation
 Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
 Permit Number: R 089-18519
 Pit ID: 089-00406
 Reviewer: Stephanie A. Roy
 Application Date: December 18, 2003

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	2.00	5.00		0.0055	0.0005			0.055	0.005	0.00	0.00	0.005
Metal Inert Gas (MIG)(carbon steel)	2.00	12.0		0.0055	0.0005			0.132	0.012	0.00	0.00	0.012
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	2.00	1.125	18.0	0.162	0.0005	0.0001	0.0003	0.394	0.00	0.00	0.00	0.00
EMISSION TOTALS												
Potential Emissions lbs/hr								0.581	0.017	0.00	0.00	0.017
Potential Emissions lbs/day								13.9	0.410	0.00	0.00	0.410
Potential Emissions tons/year								2.55	0.075	0.00	0.00	0.075

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". See Rebecca Mason if you need a copy.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emissions Calculations
Summary from Entire Source**

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Permit Number: R 089-18519
Plt ID: 089-00406
Reviewer: Stephanie A. Roy
Date: December 18, 2003

Uncontrolled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Surface Coating	11.1	11.1	0.00	0.00	15.9	0.00
Welding / Torch Cutting	2.55	2.55	0.00	0.00	0.00	0.00
Total	13.7	13.7	0.00	0.00	15.9	0.00

Controlled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Surface Coating	0.333	0.333	0.00	0.00	15.9	0.00
Welding / Torch Cutting	2.55	2.55	0.00	0.00	0.00	0.00
Total	2.88	2.88	0.00	0.00	15.9	0.00

HAPs Emissions (tons per year)

Facility	Manganese	Total
Surface Coating	0.00	0.00
Welding / Torch Cutting	0.075	0.075
Total	0.075	0.075