INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We make Indiana a cleaner, healthier place to live.*

*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 6, 2007

RE: Norfolk Southern Railway Company / 039-21446-00548

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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.

Enclosures
FNPER.dot12/03/07

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MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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# Minor Source Operating Permit Renewal
# OFFICE OF AIR QUALITY

## Norfolk Southern Railway Company
## Route 19 and Lusher Ave.
## Elkhart, Indiana 46515

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 MSOP under 326 IAC 2-6.1.

| Operation Permit No.: M039-21446-00548 | |
|---|---|
| Issued by:<br><br>Original document signed by<br><br>Matthew Stuckey, Deputy Branch Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: December 6, 2007<br><br><br><br>Expiration Date: December 6, 2012 |

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary rail classification yard and diesel terminal.

| | |
|---|---|
| Source Address: | Route 19 and Lusher Ave., Elkhart, Indiana 46515 |
| Mailing Address: | 110 Franklin Road, SE, Box 13, Roanoke, VA 24042-0013 |
| General Source Phone Number: | 574-296-2366 |
| SIC Code: | 4013 |
| County Location: | Elkhart |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) diesel fuel storage tanks, identified as 3400, 3401, with a maximum capacity of 750,000 and 330,000 gallons, exhausting to stacks V002 and V001, respectively.

(b) Two (2) diesel fuel storage tanks, identified as 46 and 47, constructed in 2000, with a maximum capacity of 1,000,000 gallons each, exhausting to stacks V003 and V004, respectively,

(c) One (1) Sand Distribution System, identified as SDS, constructed in 2005 with a maximum capacity of 6 tons of sand per hour. This unit consists of:

(1) One (1) sand silo with a storage capacity of 75 tons of sand, using a bagfilter as control, exhausting to vent V005;

(2) One (1) distribution tank; and

(3) Four (4) sand pumps equipped with cartridge filters.

(d) Five (5) fuel oil fired furnaces, identified as 3459, 3462, 6465 and 3460 with maximum capacity of 1.9, 0.77, 0.1, 0.53 and 0.77 MMBtu per hour, respectively.

(e) Five (5) fuel oil fired portable furnaces with maximum capacity of 0.6, 0.6, 0.6, 0.05 and 0.05 MMBtu per hour.

(f) Seven (7) emergency diesel generator sets, with maximum capacity of 150, 100, 100, 230, 60, 320, and 275 Kilowatt hour.

(h) One (1) sand hopper, identified as 3407, with a maximum capacity of 1,259 tons per year.

(i) Three (3) distillate oil fired boilers, identified as 3455, 3456 and 3457, with a maximum rated capacity of 2.678 million British thermal units per hour, exhausting to stacks S001, S002 and S003 respectively.

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

### B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M039-21446-00548, 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, 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, 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

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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Severability

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

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ 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

(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 an "authorized individual" 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251

(c) The notification 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 on or before the date it is due.

B.10 Preventive Maintenance Plan [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 upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M039-21446-00548 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(b) A timely renewal application is one that is:

(1) Submitted at least ninety (90) days 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 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 2-6.1 until IDEM, OAQ 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 any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) 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.19 Credible Evidence [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 2-6.1-5(a)(1)]**

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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 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.

C.4 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.5 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.6 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.7 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

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-6.1-5(a)(2)]**

C.8 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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ 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.9 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 2-6.1-5(a)(2)]**

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11]

(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**

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as

practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) 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

(b) 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 on or before the date it is due.

(c) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) 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.

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

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

(a) Two (2) diesel fuel storage tanks, identified as 3400, 3401, with a maximum capacity of 750,000 and 330,000 gallons, exhausting to stacks V002 and V001, respectively.

(b) Two (2) diesel fuel storage tanks, identified as 46 and 47, constructed in 2000, with a maximum capacity of 1,000,000 gallons each, exhausting to stacks V003 and V004, respectively,

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for this facility.

**New Source Performance Standards (NSPS) Requirements**

D.1.2 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the three diesel fuel storage tanks constructed in 1988 and 2000 except when otherwise specified in 40 CFR 60, Subpart Kb.

D.1.3 New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60, Subpart Kb]

Pursuant to 40 CFR, Subpart Kb, the diesel fuel storage tanks constructed in 1988 and 2000 are subject to this rule because they each have a storage capacity greater than 151 $m^3$ (39,890 gallons) with true vapor pressure less than 3.5 kPa, and were constructed after July 23, 1984. Therefore, these storage tanks shall comply with the following provisions:

§ 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.

(c) Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 $m^3$ storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 $m^3$ but less than 151 $m^3$ storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

(d) Except as provided in paragraph (g) of this section, the owner or operator of each storage

vessel either with a design capacity greater than or equal to 151 $m^3$ storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 $m^3$ but less than 151 $m^3$ storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor vapor pressure values for each volume range.

(e) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.

(1) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

(2) For crude oil or refined petroleum products the vapor pressure may be obtained by the following:

(i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

(ii) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

(3) For other liquids, the vapor pressure:

(i) May be obtained from standard reference texts, or

(ii) Determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or

(iii) Measured by an appropriate method approved by the Administrator; or

(iv) Calculated by an appropriate method approved by the Administrator.

(f) The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements.

(1) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in paragraph (e) of this section.

(2) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:

(i) ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or

(ii) ASTM D323–82 or 94 (incorporated by reference—see §60.17); or

(iii) As measured by an appropriate method as approved by the Administrator.

(g) The owner or operator of each vessel equipped with a closed vent system and control device meeting the specification of §60.112b or with emissions reductions equipment as specified in 40 CFR 65.42(b)(4), (b)(5), (b)(6), or (c) is exempt from the requirements of paragraphs (c) and (d) of this section.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

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

(a) One (1) Sand Distribution System, identified as SDS, constructed in 2005 with a maximum capacity of 6 tons of sand per hour. This unit consists of:

(1) One (1) sand silo with a storage capacity of 75 tons of sand, using a bagfilter as control, exhausting to vent V005;

(2) One (1) distribution tank; and

(3) Four (4) sand pumps equipped with cartridge filters.

(b) One (1) sand hopper, identified as 3407, with a maximum capacity of 1,259 tons per year.

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

D.2.1 Particulate Emissions [326 IAC 6-3-2]

The particulate from the sand distribution system shall be limited by the following:

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

$E = 4.10 \times 6^{0.67}$

E= 13.62 lbs/hour

Uncontrolled particulate emission rate for the sand distribution system is 13.62 pounds per hour.

The particulate emissions from the sand distribution system, after controls, is 0.09 pounds per hour. The sand distribution system will be able to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

The cartridge filter shall be in operation at all times the sand distribution system is in operation, in order to comply with this limit.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for this facility and all control devices.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

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

(a) Five (5) fuel oil fired furnaces, identified as 3459, 3462, 6465 and 3460 with maximum capacity of 1.9, 0.77, 0.1, 0.53 and 0.77 MMBtu per hour, respectively.

(b) Five (5) fuel oil fired portable furnaces with maximum capacity of 0.6, 0.6, 0.6, 0.05 and 0.05 MMBtu per hour.

(c) Seven (7) emergency diesel generator sets, with maximum capacity of 150, 100, 100, 230, 60, 320, and 275 Kilowatt hour.

(d) Three (3) distillate oil fired boilers, installed in 1997, identified as 3455, 3456 and 3457, with a maximum rated capacity of 2.678 million British thermal units per hour, exhausting to stacks S001, S002 and S003 respectively.

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

D.3.1 Particulate Emissions [326 IAC 6-2-4]

The PM emissions from either of the three distillate oil fired boilers rated at 2.678 MMBtu per hour heat input shall not exceed either 0.6 pounds per MMBtu heat input or the limit based on the following equation, whichever is less:

$$P_t = 1.09/Q^{0.26}$$

Where $P_t$ = Pounds of particulate matter emitted per million Btu heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit in which, the capacity specified in the operation permit shall be used.

$P_t$ = 0.84 pounds per MMBtu heat input.

Therefore, 0.6 pounds per MMBtu heat input will be the limit for PM emissions from any of the 2.678 MMBtu per hour boilers.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
**OFFICE OF AIR QUALITY**
**COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT**
**ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| | |
|---|---|
| **Company Name:** | Norfolk Southern Railway Company |
| **Address:** | Route 19 and Lusher Ave. |
| **City:** | Elkhart, Indiana 46515 |
| **Phone #:** | 574-296-2366 |
| **MSOP #:** | M039-21446-00548 |

I hereby certify that Norfolk Southern Railway Company is
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Norfolk Southern Railway Company is
- ☐ in compliance with the requirements of MSOP M039-21446-00548.
- ☐ not in compliance with the requirements of MSOP M039-21446-00548.

| |
|---|
| **Authorized Individual (typed):** |
| **Title:** |
| **Signature:** |
| **Date:** |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|---|
| **Noncompliance:** |
| |
| |
| |
| |

## MALFUNCTION REPORT

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
## OFFICE OF AIR QUALITY
### FAX NUMBER - 317 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMI LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

# Indiana Department of Environmental Management
Office of Air Quality

## Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

**Source Background and Description**

| | |
|---|---|
| **Source Name:** | **Norfolk Southern Railway Company** |
| **Source Location:** | **Route 19 and Lusher Avenue, Elkhart, IN 46515** |
| **County:** | **Elkhart** |
| **SIC Code:** | **4013** |
| **Permit Renewal No.:** | **M039-21446-00548** |
| **Permit Reviewer:** | **Anne-Marie C. Hart** |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Norfolk Southern Railway Company relating to the operation of a rail classification yard and diesel terminal.

**History**

Norfolk Southern was issued a FESOP (F039-12839-00548) on April 12, 2001. On July 13, 2005, Norfolk Southern applied for a FESOP renewal (F039-21446-00548). Previous calculations regarding the emergency diesel generator sets were based on 8760 operating hours, equivalent to twenty-four (24) hours a day, seven (7) days a week. This resulted in NOx emissions greater than one hundred (100) tons per year. However, on September 6, 1995, the EPA issued a memorandum determining the calculations associated with emergency generators not exceed five hundred (500) annual operating hours. Based on calculation revisions associated with this renewal, NOx emissions are below Title V levels. Therefore, Norfolk Southern will be issued an MSOP (M039-21446-00548).

**Permitted Emission Units and Pollution Control Equipment**

(a) Two (2) diesel fuel storage tanks, identified as 3400, 3401, installed in 1988 and 1957, with a maximum capacity of 750,000 and 330,000 gallons, exhausting to stacks V002 and V001, respectively.

(b) Two (2) diesel fuel storage tanks, identified as 46 and 47, constructed in 2000, with a maximum capacity of 1,000,000 gallons each, exhausting to stacks V003 and V004, respectively.

(c) One (1) Sand Distribution System, identified as SDS, constructed in 2005 with a maximum capacity of 6 tons of sand per hour. This unit consists of:

(1) One (1) sand silo with a storage capacity of 75 tons of sand, using a bagfilter as control, exhausting to vent V005;

(2) One (1) distribution tank; and

(3) Four (4) sand pumps equipped with cartridge filters.

(d) Five (5) fuel oil fired furnaces, identified as 3459, 3462, 6465 and 3460 with maximum capacity of 1.9, 0.77, 0.10, 0.53 and 0.77 MMBtu per hour, respectively.

(e) Five (5) fuel oil fired portable furnaces with maximum capacity of 0.60, 0.60, 0.60, 0.05 and 0.05 MMBtu per hour.

(f) Seven (7) emergency diesel generator sets, with maximum capacity of 150, 100, 100, 230, 60, 320, and 275 Kilowatt hour.

(h) One (1) sand hopper, identified as 3407, with a maximum capacity of 1,259 tons per year.

(i) Three (3) distillate oil fired boilers, installed in 1997, identified as 3455, 3456 and 3457, with a maximum rated capacity of 2.678 million British thermal units per hour, exhausting to stacks S001, S002 and S003 respectively.

**Emission Units and Pollution Control Equipment Removed From the Source**

(a) One (1) sand hopper, identified as 3412, with a maximum capacity of 1,259 tons per year, removed in 2005 as a result of Significant Permit Revision 039-20992-00548, issued September 6, 2005.

**Existing Approvals**

Since the issuance of the FESOP (039-12839-00548) on April 12, 2001, the source has constructed or has been operating under the following approvals as well:

(a) Administrative Amendment No. (039-20043-00548) issued on February 3, 2005; and

(b) Significant Permit Revision No. (039-20992-00548) issued on September 6, 2005.

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 | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature ($^0$F) |
|---|---|---|---|---|---|
| S001 | Boiler 3455 | 30 | 1.17 | 700 | 650 |
| S002 | Boiler 3456 | 30 | 1.17 | 700 | 650 |
| S003 | Boiler 3457 | 30 | 1.17 | 700 | 650 |

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Elkhart County

| Pollutant | Status |
|---|---|
| $PM_{10}$ | Attainment |
| $PM_{2.5}$ | Attainment |
| $SO_2$ | Attainment |
| NOx | Attainment |
| 8-hour Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

Note: On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

(a) Elkhart County has been classified as unclassifiable or attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 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 standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for PM 10, $SO_2$, NOx, 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 – Entire Source section.

(d) 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.

(e) 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 | 42.26 |
| PM-10 | 28.60 |
| $SO_2$ | 32.51 |
| VOC | 1.20 |

| Pollutant | tons/year |
|---|---|
| CO | 3.20 |
| $NO_x$ | 13.34 |

| HAPs | tons/year |
|---|---|
| Arsenic | 1.09 E-04 |
| Beryllium | 8.16 E-05 |
| Cadmium | 8.16 E-05 |
| Chromium | 8.16 E-05 |
| Lead | 2.45 E-04 |
| Mercury | 8.16 E-05 |
| Manganese | 1.63 E-04 |
| Nickel | 8.16 E-05 |
| Selenium | 4.08 E-04 |
| Total | 1.33 E-03 |

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria polllutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7; therefore, the source will be issued an MSOP.

(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.

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 2002 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|---|---|
| **PM** | 3 |
| **PM-10** | 3 |
| **$SO_2$** | 15 |
| **VOC** | 1 |
| **CO** | 1 |
| **$NO_x$** | 5 |
| **Lead** | 0 |

**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 enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| | Potential To Emit (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| **Process/emission unit** | **PM** | **PM-10** | **$SO_2$** | **VOC** | **CO** | **$NO_x$** | **HAPs** |
| Diesel Storage Tanks | - | - | - | 0.62 | - | - | - |
| Distillate Oil Fired Boilers | 1.8 | 1.8 | 18.9 | 0.10 | 1.3 | 5.0 | - |
| Sand Hopper | 1.89 | 1.89 | - | - | - | - | - |
| Sand Distribution | 0.38 | 0.24 | - | - | - | - | - |
| Emergency Diesel Generator | 0.33 | 0.33 | 0.31 | 0.38 | 1.0 | 4.64 | Negligible |
| Fuel Oil Furnaces | 0.40 | 0.40 | 13.30 | 0.10 | 0.90 | 3.70 | Negligible |
| Total Emissions | 4.8 | 4.66 | 32.51 | 1.20 | 3.2 | 13.34 | Negligible |

"-" indicates no emissions of the pollutant from the process/emission unit

(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**

(a) The diesel storage tank, identified as 3400, installed in 1988 with a capacity of 750,000 gallons and the diesel storage tanks, identified as 46 and 47, installed in 2000 with capacities of 1,000,000 gallons each are subject to the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage vessles) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b, Subpart Kb), which is incorporated by reference as 326 IAC 12. These storage tanks have a capacity larger than 151 $m^3$ (39,890 gallons) with true vapor pressure less than 3.5 kPa and were constructed after July 23, 1984.

Nonapplicable portions of the NSPS will not be included in the permit. The diesel storage tanks are subject to the following portions of Subpart Kb:

(1) 40 CFR 60.116b

(b) The requirements of 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reciprocating Internal Combustion Engines) and 326 IAC 20 are not applicable to DEG-7 because it is not located at a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination HAPs).

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source is not one of the 28 PSD source categories with a PSD major threshold of 100 tons per year and the potential to emit for all criteria pollutants at this source is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-3 (Emission Offset)

Elkhart County has been designated as attainment for the 8-hour ozone standard. The VOC PTE is less than 100 tons per year at this source, therefore this source is not subject to the requirements of 326 IAC 2-3 at this time.

326 IAC 2-4.1 (Hazardous Air Pollutants (HAPs))

This source is not a major source of HAPs. Therefore, this facility are not subject to the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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.

326 IAC 6-4 (Fugitive Dust Emissions)

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).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source does not have the potential to emit fugitive particulate matter equal to or greater than twenty-five (25) tons per year. Therefore, this source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations).

**State Rule Applicability – Individual Facilities**

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The PM emissions from either of the three distillate oil fired boilers rated at 2.678 MMBtu per hour heat input shall not exceed either 0.6 pounds per MMBtu heat input or the limit based on the following equation, whichever is less:

$$P_t = 1.09/Q^{0.26}$$

Where $P_t$ = Pounds of particulate matter emitted per million Btu heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit in which, the capacity specified in the operation permit shall be used.

$P_t$ = 0.84 pounds per MMBtu heat input.

Therefore, 0.6 pounds per MMBtu heat input will be the limit for PM emissions from any of the 2.678 MMBtu per hour boilers.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The particulate from the sand distribution system shall be limited by the following:

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

$E = 4.10 \times 6^{0.67}$

E = 13.62 pounds per hour

Uncontrolled particulate emission rate for the sand distribution system is 13.62 pounds per hour.

The particulate emissions from the sand distribution system, after controls, is 0.09 pounds per hour. The sand distribution system will be able to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

The cartridge filter shall be in operation at all times the sand distribution system is in operation, in order to comply with this limit.

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)
The rail classification yard and diesel terminal is located in Elkhart County. Therefore, it is not subject to the provisions established in 326 IAC 6.5-1.

**Recommendation**

The staff recommends to the Commissioner that the MSOP 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 July 13, 2005.

**Conclusion**

The operation of this rail classification yard and diesel terminal shall be subject to the conditions of the attached MSOP No. M039-21446-00548.

**Appendix A: Emissions Calculations**
**Summary of Potential to Emit**

**Company Name:** Norfolk Southern Railway Company
**Address City IN Zip:** Route 19 and Lusher Avenue, Elkhart IN 46515
**Permit #:** M039-21446-00548
**Plt ID:** 039-00548
**Reviewer:** Anne-Marie C. Hart
**Date:** August 9, 2007

| Activity Type | PM | PM 10 | $SO_2$ | VOC | CO | NOx | HAPs |
|---|---|---|---|---|---|---|---|
| Diesel Storage Tanks | 0.00 | 0.00 | 0.00 | 0.62 | 0.00 | 0.00 | 0.00 |
| Distillate Oil Fired Boilers | 1.80 | 1.80 | 18.90 | 0.10 | 1.30 | 5.00 | 0.00 |
| Sand Hopper | 1.89 | 1.89 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Sand Distribution* | 37.84 | 24.18 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Emergency Diesel Generators | 0.33 | 0.33 | 0.31 | 0.38 | 1.00 | 4.64 | 5.16E-05 |
| Fuel Oil Furnaces | 0.40 | 0.40 | 13.30 | 0.10 | 0.90 | 3.70 | 1.28E-03 |
| Total Emissions | 42.26 | 28.60 | 32.51 | 1.20 | 3.20 | 13.34 | 1.33E-03 |
| Total Controlled Emissions | 4.80 | 4.66 | 32.51 | 1.20 | 3.20 | 13.34 | 1.33E-03 |

* Uncontrolled Potential Emissions

Controlled PTE for Sand Distribution (ton/year) = .38 and .24 for PM and PM 10, respectively

## Appendix A: Emissions Calculations
## Storage Tank Results from TANKS 4.0.9d

**Company Name:** Norfolk Southern Railway Company
**Address City IN Zip:** Route 19 and Lusher Avenue, Elkhart IN 46515
**Permit #:** M039-21446-00548
**Plt ID:** 039-00548
**Reviewer:** Anne-Marie C. Hart
**Date:** August 9, 2007

| | pounds per year | | |
|---|---|---|---|
| Tank Capacity (gallons) | Working Loss | Breathing Loss | Total Loss |
| 330,000 | 115.94 | 24.43 | 140.37 |
| 750,000 | 263.50 | 47.36 | 310.87 |
| 1,000,000 | 351.33 | 42.57 | 393.90 |
| 1,000,000 | 351.33 | 42.57 | 393.90 |

| | |
|---|---|
| Total (lbs/year) | 1239.04 |
| Total (tons/year) | 0.61952 |

**Methodology**

Total Loss calculated from TANKS 4.0.9d software developed by the American Petroleum Institute

Total emissions (tons/year) = Total Loss of four tanks (lbs/year) / 2000

**Appendix A: Emissions Calculations**
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**
**#4 Fuel Oil**

**Company Name:** Norfolk Southern Railway Company
**Address City IN Zip:** Route 19 and Lusher Avenue, Elkhart IN 46515
**Permit #:** M039-21446-00548
**Plt ID:** 039-00548
**Reviewer:** Anne-Marie C. Hart
**Date:** August 9, 2007

| Heat Input Capacity MMBtu/hr | Potential Throughput kgals/year | S = Weight % Sulfur |
|---|---|---|
| | | 0.5 |
| 8.034 | 502.6989 | |

| | Pollutant | | | | |
|---|---|---|---|---|---|
| | PM* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/kgal | 7.0 | 75 *(150.0S)* | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 1.8 | 18.9 | 5.0 | 0.1 | 1.3 |

**Methodology**

1 gallon of No. 4 Fuel Oil has a heating value of 150,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix A: Emissions Calculations**
**Sand Hopper 3407**
**Company Name: Norfolk Southern Railway Company**
**Address City IN Zip: Route 19 and Lusher Avenue, Elkhart IN 46515**
**Permit #: M039-21446-00548**
**Plt ID: 039-00548**
**Reviewer: Anne-Marie C. Hart**
**Date: August 9, 2007**

| Emission Unit | Annual Sand Usage | Emission Factor (lb/ton) | PM Emissions (lb/year) | PM Emissions (tons/year) |
|---|---|---|---|---|
| Sand Hopper 3407 | 1259 | 3.000 | 3777 | 1.889 |

**Total:** 1.889

Methodology

PM emissions (lb/year) = Annual Sand Usage (tons) x Emission Factor (lb/ton)

PM emissions (tons/year) = PM emissions (lb/year) / 2000 (lbs/ton)

Emission Factor from AP 42, Tables 11.13-2 Fifth edition

Worst case: assume all PM to be PM10

**Appendix A: Emissions Calculations**
**Emissions from Material Handling**
**Source Name:** Norfolk Souther Railway Company
**Address City IN Zip:** Route 19 and Lusher Avenue, Elkhart, IN 46515
**Permit #:** M039-21446-00548
**Plant ID:** 039-00548
**Reviewer:** Anne-Marie C. Hart
**Date:** August 9, 2007

Emissions from Sand Distribution System: silo vent and loading operations

Maximum Capacity (ton/hr): 6

| Pollutant | Emission Factor (lb/ton) | Bagfilter Control Efficiency | Uncontrolled Potential Emissions (ton/year) | Controlled Potential Emissions (ton/year) |
|---|---|---|---|---|
| PM | 0.72 | 99% | 18.92 | 0.19 |
| PM10 | 0.46 | 99% | 12.09 | 0.12 |

Emissions from Sand Distribution System: sand pumps and unloading operations

Maximum Capacity (ton/hr): 6

| Pollutant | Emission Factor (lb/ton) | Cartridge Filter Control Efficiency | Uncontrolled Potential Emissions | Controlled Potential Emissions (ton/year) |
|---|---|---|---|---|
| PM | 0.72 | 99% | 18.92 | 0.19 |
| PM10 | 0.46 | 99% | 12.09 | 0.12 |
| | | **Total PM:** | **37.84** | **0.38** |
| | | **Total PM10:** | **24.18** | **0.24** |

Emission Factors from AP-42, Ch.11.12 (Concrete Batching), Table 11.12-2

## Appendix A: Emission Calculations

### Emergency Generators - Diesel Fuel Combustion

**Company Name:** Norfolk Southern Railway Company
**Address City IN Zip:** Route 19 and Lusher Avenue, Elkhart IN 46515
**Permit #:** M039-21446-00548
**Plt ID:** 039-00548
**Reviewer:** Anne-Marie C. Hart
**Date:** August 9, 2007

Heat Input Capacity
MM Btu/hr

| 4.21 |
|---|

| **Criteria Pollutants** | Pollutant | | | | | |
|---|---|---|---|---|---|---|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMBtu | 0.31 | 0.31 | 0.29 | 4.41 | 0.36 | 0.95 |
| Potential Emission in tons/yr | 0.33 | 0.33 | 0.31 | 4.64 | 0.38 | 1.00 |

**Methodology**
Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton )
Emergency generator PTE based on 500 operating hours/year

**HAPs**

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| Emission Factor (lb/MMBtu) | Arsenic | Beryllium | Cadmium | Chromium | Lead |
| | 4.00E-06 | 3.00E-06 | 3.00E-06 | 3.00E-06 | 9.00E-06 |
| Potential to Emit (ton/year) | 4.21E-06 | 3.16E-06 | 3.16E-06 | 3.16E-06 | 9.47E-06 |

| | HAPs - Metals (continued) | | | | |
|---|---|---|---|---|---|
| Emission Factor (lb/MMBtu) | Mercury | Manganese | Nickel | Selenium | |
| | 3.00E-06 | 6.00E-06 | 3.00E-06 | 1.50E-05 | |
| Potential to Emit (ton/year) | 3.16E-06 | 6.32E-06 | 3.16E-06 | 1.58E-05 | |
| | | | | Total HAPs: | 5.16E-05 |

**Methodology**
Emission (tons/year) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 500 (hr/year) x 1/2000 (ton/lb)

*PM emission factors are assumed to be equivalent to PM10 emission factors.

**Appendix A: Emissions Calculations**
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**
**#1 and #2 Fuel Oil**
**Emissions from smaller furnaces**

**Company Name:** Norfolk Southern Railway Company
**Address City IN Zip:** Route 19 and Lusher Avenue, Elkhart IN 46515
**Permit #:** M039-21446-00548
**Plt ID:** 039-00548
**Reviewer:** Anne-Marie C. Hart
**Date:** August 9, 2007

| Heat Input Capacity MMBtu/hr | Potential Throughput kgals/year | S = Weight % Sulfur |
|---|---|---|
| | | 0.5 |
| 5.97 | 373.5514 | |

| | Pollutant | | | | |
|---|---|---|---|---|---|
| | PM* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/kgal | 2.0 | 71 *(142.0S)* | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 0.4 | 13.3 | 3.7 | 0.1 | 0.9 |

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See page 8 for HAPs emission calculations.

**Appendix A: Emissions Calculations**
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**
**#1 and #2 Fuel Oil**
**HAPs Emissions**
**Emissions from smaller furnaces**

**Company Name:** Norfolk Southern Railway Company
**Address City IN Zip:** Route 19 and Lusher Avenue, Elkhart IN 46515
**Permit #:** M039-21446-00548
**Plt ID:** 039-00548
**Reviewer:** Anne-Marie C. Hart
**Date:** August 9, 2007

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Arsenic | Beryllium | Cadmium | Chromium | Lead |
| Emission Factor in lb/mmBtu | 4.0E-06 | 3.0E-06 | 3.0E-06 | 3.0E-06 | 9.0E-06 |
| Potential Emission in tons/yr | 1.05E-04 | 7.84E-05 | 7.84E-05 | 7.84E-05 | 2.35E-04 |

| | HAPs - Metals (continued) | | | | |
|---|---|---|---|---|---|
| | Mercury | Manganese | Nickel | Selenium | |
| Emission Factor in lb/mmBtu | 3.0E-06 | 6.0E-06 | 3.0E-06 | 1.5E-05 | |
| Potential Emission in tons/yr | 7.84E-05 | 1.57E-04 | 7.84E-05 | 3.92E-04 | |
| | | | | Total HAPs: | 1.28E-03 |

**Methodology**

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton