



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: October 11, 2007
RE: Stanrail Corporation, Inc. / 089-24690-00406
FROM: Nisha Sizemore
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, Room 1049, 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.dot 03/23/06



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**New Source Review and Minor Source Operating
Permit
OFFICE OF AIR QUALITY
AND GARY DEPARTMENT OF ENVIRONMENTAL
AFFAIRS**

**Stanrail Corporation
1225 Martin Luther King Drive
Gary, Indiana 46402**

(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.: M089-24690-00406	
Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 11, 2007 Expiration Date: October 11, 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) and Gary Department of Environmental Affairs (GDEA). 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 car parts fabrication and painting source.

Source Address:	1225 Martin Luther King Drive, Gary, Indiana 46402
Mailing Address:	1225 Martin Luther King Drive, Gary, Indiana 46402
General Source Phone Number:	(219) 932 5200
SIC Code:	3744
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) dip coating operation for uncoupling levers, identified as Line 4, installed in 2003, consisting of the following:
 - (1) Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.
 - (2) One (1) conveyor line.
 - (3) One (1) robotic MIG welding station.

- (b) One (1) dip coating operation for nailable steel channels for railcar flooring, identified as Line 3, consisting of the following:
 - (1) One (1) dip tank located in the paint drying room, applying extreme performance coatings, identified as Line 3 dip tank, installed in 1995, capacity: forty (40) steel floor channels per hour.
 - (2) One (1) conveyer line, identified as Line 3 conveyer line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.
 - (3) 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.

- (c) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) plasma cutting torches (capacity: less than or equal to 0.375 inch thick steel cut at one hundred fifty (150) inches per minute), and six (6) oxy fuel cutting torches (capacity: less than or equal to 2.5 inch thick steel cut at twenty (20) inches per minute), installed in 2001.
- (d) One (1) electric resistance welder with no emissions, installed in 2000.
- (e) One (1) rollform area, installed in 1996, consisting of:
 - (1) Two (2) rollformers equipped with electric motors with no emissions.
 - (2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.
 - (3) Uncoilers.
- (f) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.
- (g) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (h) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (i) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.
- (j) Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.
- (k) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
 - (1) One (1) metal boxcar parts surface coating spray booth, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
 - (2) One conveyor line installed in 2007.
 - (3) One degreasing station used to clean the doors prior to coating.
 - (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- (l) One (1) Small Parts coating booth applying extreme performance coatings, with a maximum capacity of 1 gallon of coating applied per hour when coating small parts, with particulate emission controlled by a dry filter system exhausting through Stack V-2. The booth is primarily used for coating small parts for rail cars; however, the booth may also be used for coating rail bogies or other large pieces when necessary, with a maximum capacity of 1.25 gallons of coating per hour.
- (m) Thirty-three (33) MIG welders.

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, M089-24690-00406, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and GDEA, 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

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

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 and GDEA, within a reasonable time, any information that IDEM, OAQ and GDEA 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 and GDEA 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:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
MC 61-52 IGCN 1003
Indianapolis, IN 46204-2251

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

- (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 and GDEA 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and GDEA upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and GDEA. IDEM, OAQ and GDEA 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 M089-24690-00406 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 GDEA 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

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

- (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 and GDEA 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 and GDEA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and GDEA 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

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

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, and GDEA 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

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

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 and GDEA 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 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 and GDEA, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 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 twenty percent (20%) 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.3 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.4 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.5 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.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

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

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

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 and GDEA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and GDEA 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 or GDEA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or GDEA 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

and

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402

- (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 and GDEA 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and GDEA. The general public may request this information from the IDEM, OAQ and GDEA under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) dip coating operation for uncoupling levers, identified as Line 4, installed in 2003, consisting of the following:
 - (1) Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.
 - (2) One (1) conveyor line.
 - (3) One (1) robotic MIG welding station.
- (b) One (1) dip coating operation for nailable steel channels for railcar flooring, identified as Line 3, consisting of the following:
 - (1) One (1) dip tank located in the paint drying room, applying extreme performance coatings, identified as Line 3 dip tank, installed in 1995, capacity: forty (40) steel floor channels per hour.
 - (2) One (1) conveyer line, identified as Line 3 conveyer line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.
 - (3) 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.
- (c) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) plasma cutting torches (capacity: less than or equal to 0.375 inch thick steel cut at one hundred fifty (150) inches per minute), and six (6) oxy fuel cutting torches (capacity: less than or equal to 2.5 inch thick steel cut at twenty (20) inches per minute), installed in 2001.
- (d) One (1) electric resistance welder with no emissions, installed in 2000.
- (e) One (1) rollform area, installed in 1996, consisting of:
 - (1) Two (2) rollformers equipped with electric motors with no emissions.
 - (2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.
 - (3) Uncoilers.
- (f) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.
- (g) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (h) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (i) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.
- (j) Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.

- (k) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
- (1) One (1) metal boxcar parts surface coating spray booth, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
 - (2) One conveyor line installed in 2007.
 - (3) One degreasing station used to clean the doors prior to coating.
 - (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- (l) One (1) Small Parts coating booth applying extreme performance coatings, with a maximum capacity of 1 gallon of coating applied per hour when coating small parts, with particulate emission controlled by a dry filter system exhausting through Stack V-2. The booth is primarily used for coating small parts for rail cars; however, the booth may also be used for coating rail bogies or other large pieces when necessary, with a maximum capacity of 1.25 gallons of coating per hour.
- (m) Thirty-three (33) MIG welders.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating operation, identified as Small Parts Booth, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d):

- (a) Particulate from the surface coating operations, identified as Line 6 and Small Parts Booth, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) 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.

- (c) 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.

D.1.4 Conveyorized Degreaser Operation [326 IAC 8-3-4]

The owner or operator of a conveyorized degreaser shall:

- (a) minimize carryout emissions by:
 - (1) racking parts for best drainage;
 - (2) maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
- (b) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (c) repair solvent leaks immediately, or shut down the degreaser;
- (d) not use workplace fans near the degreaser opening;
- (e) not allow water in solvent exiting the water separator; and
- (f) provide a permanent conspicuous label summarizing operating requirements.

D.1.5 Conveyorized Degreaser Operation and Control [326 IAC 8-3-7]

- (a) The owner or operator of the conveyorized degreaser shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser's entrances and exits with downtime covers which are closed when the degreaser is not operating.
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (C) A vapor level control thermostat which shuts off sump heat when vapor level rises more than ten (10) centimeters (four (4) inches).
 - (3) Equip the degreaser with entrances and exits which silhouette workloads in such a manner that the average clearance between the articles and the degreaser opening is either less than ten (10) centimeters (four (4) inches) or less than ten percent (10%) of the width of the opening.
 - (4) Equip the degreaser with a drying tunnel, rotating or tumbling basket, or other equipment, which prevents cleaned articles from carrying out solvent or vapor.
 - (5) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (6) Equip the degreaser with one (1) of the following control devices:
 - (A) A refrigerated chiller.
 - (B) A carbon adsorption system with ventilation which, either the downtime cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic meters per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
 - (C) Other systems of demonstrated equivalent or better control as those outlined in clause (A) and (B). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of the conveyorized degreaser shall ensure that the following operating requirements are met:
 - (1) Minimize solvent carryout emission by the following:
 - (A) Racking articles to allow complete drainage.
 - (B) Maintaining the vertical conveyor speed at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).
 - (2) Store waste solvent only in covered containers and prohibit disposal or transfer of waste solvent in any manner, which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
 - (3) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
 - (4) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
 - (5) Prohibit the use of workplace fans near the degreaser opening.
 - (6) Prohibit visually detectable water in the solvent exiting the water separator.
 - (7) Cover the entrances and exits at all times except when processing workloads through the degreaser.

D.1.6 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the Line 6 and Small Parts Booth and one degreasing station facilities and their control device.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on month basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The cleanup solvent usage for month;
 - (4) The VOC usage for each month; and
 - (5) The calculated VOC per gallon of coating, less water.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain a log of weekly overspray observations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Record Keeping Requirements [326 IAC 8-9-6]

- (a) Pursuant to 326 IAC 8-9-6, the following records shall be maintained for the life of the one (1) propylene storage tank:
- (1) The vessel identification number.
 - (2) The vessel dimensions.
 - (3) The vessel capacity.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**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:	Stanrail Corporation
Address:	1225 Martin Luther King Drive
City:	Gary, Indiana 46402
Phone #:	(219) 932 5200
MSOP #:	M089-24690-00406

I hereby certify that Stanrail Corporation is :	<input type="checkbox"/> still in operation.
	<input type="checkbox"/> no longer in operation.
I hereby certify that Stanrail Corporation is :	<input type="checkbox"/> in compliance with the requirements of MSOP M089-24690-00406.
	<input type="checkbox"/> not in compliance with the requirements of MSOP M089-24690-00406.

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:

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Stanrail Corporation
Source Address: 1225 Martin Luther King Drive, Gary, Indiana 46402
Mailing Address: 1225 Martin Luther King Drive, Gary, Indiana 46402
FESOP Permit No.: M089-24690-00406

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter**
- Test Result (specify)** _____
- Report (specify)** _____
- Notification (specify)** _____
- Affidavit (specify)** _____
- Other (specify)** _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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 ?_____, 100 TONS/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 PERMIT 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**

Addendum to the
Technical Support Document for Minor Source Operating Permit

Source Name:	Stanrail Corporation
Source Location:	1225 Martin Luther King Drive, Gary, Indiana 46402
County:	Lake
SIC Code:	3743
Permit No.:	M089-24690-00406
Permit Reviewer:	Adeel Yousuf / EVP

On July 20, 2007, the Office of Air Quality (OAQ) had a notice published in The Post Tribune in Lake County; Merrillville, Indiana and The Times in Lake County, Munster, Indiana, stating that Stanrail Corporation had applied for a Minor Source Operating Permit (MSOP) to operate a rail car parts fabrication and painting facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 23, 2007, Rich Rentschler of Stanrail Coporation, submitted comments on the proposed MSOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1:

Correct the following information under equipment description contained in Sections A and D.

1. Line #4 dip tank is not located in the paint drying room, it is located in the main part of the plant.
2. The Burning tables has 4 torches, 2 plasma used for material 3/8" thick and under and 2 Oxy fuel torches for 3/8" thick and over.
3. The small parts booth exhausts from stack V-2 not stack 6.

Also, correct the source description listed in the TSD and permit from "box car door" to "rail car parts".

Response 1

Changes have been made to the permit as requested. See permit Revisions 2 and 3 below. Changes made to the TSD, through this Addendum, are described later in this document.

Upon further review IDEM, OAQ has made the following changes to the FESOP (additions in bold, deletions in ~~strikeout~~). The changes are made in response to the findings of the source inspection conducted by IDEM, OAQ and the Gary Department of Environmental Affairs (GDEA) on August 7, 2007.

Revision 1:

On December 22, 2006, the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air Quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

The potential to emit of VOC before control from this source is revised and is now less than 25 tons per year, based on the updated information received from the Permittee in response to the source inspection August 7, 2007 (see ATSD Appendix A, Pages 1 through 4). This source is a minor stationary source under 326 IAC 2-3 (Emission Offset). There are no changes to the permit at Section A.1 (General Information) as a result of this legal decision.

Revision 2

Section A.1 has been revised to list the correct description of the source as follows:

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 ~~box rail car door~~ **parts** fabrication and painting source.

Revision 3

Section A.2 of the permit has been revised to reflect the correct equipment description based on the August 7, 2007 IDEM, OAQ source inspection:

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) dip tank **coating operation for uncoupling levers** located in the paint drying room, identified as Line 4 dip tank (previously identified as Line 2), installed in 1995 **2003**, capacity: ~~twenty-six (26) uncoupling levers per hour~~ **consisting of the following:**
 - (1) **Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.**
 - (2) **One (1) conveyor line.**
 - (3) **One (1) robotic MIG welding station.**
- (b) One (1) **dip coating operation for nailable steel channels for railcar flooring**, identified as Line 3, consisting of the following:
 - (1) One (1) dip tank located in the paint drying room, **applying extreme performance coatings**, identified as Line 3 dip tank, installed in 1995, capacity: ~~forty-seven (47)~~ **forty (40)** steel floor channels per hour.

- (2) One (1) conveyer line, identified as Line 3 conveyer line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.
- (3) 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.
- (c) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) **flame plasma cutting torches (capacity: less than or equal to 0.375 inch thick steel cut at one hundred fifty (150) inches per minute), and six (6) oxy fuel cutting torches (capacity: less than or equal to 2.5 inch thick steel cut at twenty (20) inches per minute)**, installed in 2001, ~~capacity: less than or equal to 1.125 inch thick steel cut at eighteen (18) inches per minute.~~
- (d) One (1) electric resistance welder with no emissions, installed in 2000.
- (e) One (1) rollform area, installed in 1996, consisting of:
 - (1) Two (2) rollformers equipped with electric motors with no emissions.
 - (2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.
 - (3) Uncoilers.
- (f) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.
- (g) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (h) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (i) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.
- (j) Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.
- (k) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
 - (1) One (1) metal boxcar parts surface coating ~~line~~ **spray booth**, applying extreme performance coatings with a maximum production rate of ~~3-5~~ **4** units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
 - ~~(2) One (1) small parts coating booth, with a maximum capacity of 0.5 units per hour, with particulate emissions controlled by a dry filter system exhausting through Line 6 Stack.~~
 - (2) One conveyor line installed in 2007.**
 - (3) One degreasing station used to clean the doors prior to coating.**
 - ~~(3)~~**(4)** Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven **following the washer**, and one (1) curing oven **following the spray booth**, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- (l) **One (1) Small Parts coating booth applying extreme performance coatings, with a maximum capacity of 1 gallon of coating applied per hour when coating small parts, with particulate emission controlled by a dry filter system exhausting through Stack V-2. The booth is primarily used for coating small parts for rail cars; however, the booth may also be used for coating rail bogies or other large pieces when necessary, with a maximum capacity of 1.25 gallons of coating per hour.**

(m) Thirty-three (33) MIG welders.

Similar changes have been made to Section D.1 of the permit without replication herein.

Revision 4:

Condition C.6 (Stack Height) has been added to the permit since the revised emission calculations indicate that the sourcewide potential emissions (before controls) of particulate matter are greater than 25 tons per year. All the following conditions have been re-numbered accordingly.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

Revision 5:

Condition C.12 has been deleted from the permit since there are no compliance monitoring requirements included for any operations in Section D.1 of the permit.

C.12 Response to Excursions or Exceedances

- ~~(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.~~
- ~~(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - ~~(1) initial inspection and evaluation;~~
 - ~~(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or~~
 - ~~(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~~~
- ~~(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - ~~(1) monitoring results;~~
 - ~~(2) review of operation and maintenance procedures and records; and/or~~
 - ~~(3) inspection of the control device, associated capture system, and the process.~~~~
- ~~(d) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(e) The Permittee shall maintain the following records:
 - ~~(1) monitoring data;~~~~

~~(2) monitor performance data, if applicable; and~~

~~(3) corrective actions taken.~~

Revision 6:

Condition C.15 (Emission Statement) has been removed from the permit. The potential to emit of VOC is less than 25 tons per year for this source, based on the revised emission computations (see ATSD Appendix A, Pages 1 through 4), and therefore the requirements of 326 IAC 2-6 no longer apply. Subsequent conditions have been re-numbered accordingly.

~~C.15 Emission Statement [326 IAC 2-6]~~

~~(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.~~

~~_____ The statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, Indiana 46402~~

~~The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and GDEA on or before the date it is due.~~

Revision 7:

Condition C.15 (previously numbered as C.16) has been revised to correct a typographical error.

~~C.16~~**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~~ **Commissioner** or GDEA makes a request for records to the Permittee, the Permittee shall furnish the records to the ~~Commissioner~~ **Commissioner** or GDEA within a reasonable time.

Revision 8:

Condition D.1.1 has been revised to list the correct type of coating used at the source. Based on the revised emission calculations (see ATSD Appendix A, Pages 1 through 4), it has been determined that the Small Parts Booth is subject to the requirements of 326 IAC 8-2-9 because the actual VOC emissions exceed 15 pounds per day; and Line 6 and Line 3 are not subject to 326 IAC 8-2-9 because each line has actual VOC emissions of less than 15 pounds per day.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating operations, identified as ~~Line 3 and Line 6~~ **Small Parts Booth**, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for ~~forced warm air dried coatings~~ **extreme performance coatings**.

Revision 9:

Condition D.1.3 has been revised to add reference to the Small Parts Booth since it previously was considered as part of Line 6. However, based on the plant inspection and updated information received from the Permittee, the Small Parts Booth is a separate facility and is now reflected as such in Condition D.1.3.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d):

- (a) Particulate from the surface coating ~~operation~~ operations, **identified as** ~~Line 6~~ **Small Parts Booth**, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Revision 10:

Conditions D.1.4 and D.1.5 have been added to the permit containing the requirements for the degreaser at the facility which have been found to be subject to requirements of 326 IAC 8-3-4 and 326 IAC 8-3-7. The requirements of 326 IAC 8-3-4 (Conveyorized degreaser operation) are applicable because the source operates a conveyorized degreaser which was constructed after January 1, 1980. The requirements of 326 IAC 8-3-7 (Conveyorized degreaser operation and control) are also applicable because the operation was constructed after July 1, 1990.

D.1.4 Conveyorized Degreaser Operation [326 IAC 8-3-4]

The owner or operator of a conveyorized degreaser shall:

- (a) minimize carryout emissions by:
 - (1) racking parts for best drainage;
 - (2) maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
- (b) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (c) repair solvent leaks immediately, or shut down the degreaser;
- (d) not use workplace fans near the degreaser opening;
- (e) not allow water in solvent exiting the water separator; and

- (f) provide a permanent conspicuous label summarizing operating requirements.

D.1.5 ConveyORIZED Degreaser Operation and Control [326 IAC 8-3-7]

- (a) The owner or operator of the conveyORIZED degreaser shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser's entrances and exits with downtime covers which are closed when the degreaser is not operating.
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (C) A vapor level control thermostat which shuts off sump heat when vapor level rises more than ten (10) centimeters (four (4) inches).
 - (3) Equip the degreaser with entrances and exits which silhouette workloads in such a manner that the average clearance between the articles and the degreaser opening is either less than ten (10) centimeters (four (4) inches) or less than ten percent (10%) of the width of the opening.
 - (4) Equip the degreaser with a drying tunnel, rotating or tumbling basket, or other equipment, which prevents cleaned articles from carrying out solvent or vapor.
 - (5) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (6) Equip the degreaser with one (1) of the following control devices:
 - (A) A refrigerated chiller.
 - (B) A carbon adsorption system with ventilation which, either the downtime cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic meters per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
 - (C) Other systems of demonstrated equivalent or better control as those outlined in clause (A) and (B). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of the conveyORIZED degreaser shall ensure that the following operating requirements are met:
- (1) Minimize solvent carryout emission by the following:
 - (A) Racking articles to allow complete drainage.
 - (B) Maintaining the vertical conveyor speed at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).

- (2) **Store waste solvent only in covered containers and prohibit disposal or transfer of waste solvent in any manner, which greater than twenty percent (20%) of the waste solvent by weight could evaporate.**
- (3) **Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.**
- (4) **Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.**
- (5) **Prohibit the use of workplace fans near the degreaser opening.**
- (6) **Prohibit visually detectable water in the solvent exiting the water separator.**
- (7) **Cover the entrances and exits at all times except when processing workloads through the degreaser.**

Revision 11:

A spelling correction has been made in Section D.1 as follows:

Record ~~keeping~~ **Keeping** and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

Revision 12:

A certification form has been added at the end of the permit in accordance with the related reference contained at Condition B.8(b). This form was inadvertently omitted from the draft permit.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Stanrail Corporation
Source Address: 1225 Martin Luther King Drive, Gary, Indiana 46402
Mailing Address: 1225 Martin Luther King Drive, Gary, Indiana 46402
FESOP Permit No.: M089-24690-00406

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

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

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

While the preceding specified revisions have been made to the permit, the Technical Support Document (TSD) remains unaltered. The OAQ prefers that the TSD reflect the draft version of the permit that was placed on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. As such, certain sections of the TSD are replicated and revised as shown below. These revisions provide for clarity and consistency with the permit revisions described above.

Change 1:

Following is the corrected description of the source:

Source Background and Description

The Office of Air Quality (OAQ) has reviewed the operating permit application from Stanrail Corporation relating to the ~~box rail car door~~ **parts** fabrication and painting source.

Change 2:

Following is the corrected historical information about this source:

Stanrail Corporation (“Stanrail”) submitted an application in January 1993 for a dip coating operation at an initial location in Griffith, Indiana. Construction Permit 089-2877-00406, was issued April 14, 1994, for the Griffith plant. In June 1995, Stanrail submitted an application to move the operations to the current location, 1225 Martin Luther King Drive, Gary, Indiana. Registration 089-4672 was issued August 2, 1995, for the Gary location. Registration 089-15138-00167 was issued February 15, 2002, for box car door coating operations at a second location in Gary, 201 Mississippi Street, known as the North Plant.

~~On April 20, 2007, Stanrail Corporation submitted an application to the OAQ requesting to modify its operating permit. Stanrail Corporation was issued a Registration permit No. 089-18519-00406 on August 13, 2004, for the main plant, at the Martin Luther King Drive location. Stanrail Corporation has closed its North Plant located at 201 Mississippi Street, in Gary, Indiana, permitted under a Registration No. 089-15138-00167, issued on February 15, 2002, and moved the North Plant equipment to the main plant. has as one (1) surface coating line (Line 6), and three (3) natural gas combustion units from the North plant to this plant at 1225 Martin Luther King Drive, Gary, Indiana 46402. On April 20, 2007, Stanrail Corporation submitted an application to the OAQ requesting to modify its operating permit. Due to the addition of these units, this source the operations at the Martin Luther King Drive location will transition to a Minor Source Operating Permit (MSOP) level.~~

Additional Information:

The Stanrail website lists numerous additional services that are available under the business name Midwest Metal Fabricators, including metal parts production, shot blasting, and surface coating. This is an outside company that Stanrail is working on developing. The additional process operations, such as the shot blasting, are all done at outside sources that have no common ownership or control with Stanrail and only do occasional contract work for Stanrail.

Stanrail Corporation also has a secondary business known as American Wheel Truing, located onsite in the main building. This is a subdivision of Stanrail that sells and distributes rail car parts that are produced by outside vendors and machine shops.

Change 3:

Existing Approval section in the TSD is updated as follows to clarify the plant locations:

The source has been operating under previous approvals including, but not limited to, the following:

Registration Construction and Operation Status 089-18519-00406, issued on August 13, 2004, **for the operations at 1225 Martin Luther King Drive.**

Registration 089-15138-004167, issued February 15, 2002, for the North Plant operations at 210 Mississippi Street.

Change 4:

Due to the rule change discussed under permit Revision 1, following is the revised discussion under the County Attainment Status section in the TSD:

County Attainment Status

The source is located in Lake County.

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

(a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County, as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. 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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake 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.~~

(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.

(1) On December 22, 2006, the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

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 NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability – Entire Source section.

(2) VOC and NOx 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 NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

Change 5:

Following are corrected source Unrestricted Potential Emissions based on the updated information acquired from the source (see ATSD Appendix A, Pages 1 through 4):

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	27.22 71.55
PM-10	27.52 71.85
SO ₂	0.03
VOC	38.16 18.84
CO	4.40
NO _x	5.30

HAPs	tons/year
Hexane	0.094
Manganese	0.014 0.41
Total	0.108 0.51

Change 6:

Following is the corrected Potential to Emit After Issuance table for the source based on the updated information acquired from the source:

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.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operation (Lines 3, 4 and 6)	0.75 10.77	0.75 10.77	0.00	37.86 18.54	0.00	0.00	0.00
Welding Operations	4.97 17.60	4.97 17.60	0.00	0.00	0.00	0.00	0.014 0.41 (single/total)
Natural Gas Combustion Units	0.10	0.40	0.03	0.30	4.40	5.30	0.094 (single) 0.099 (total)
Total Emissions	2.82 28.47	3.12 28.77	0.03	38.16 18.84	4.40	5.30	0.094 0.41 (single) 0.14 0.51 (total)

- (b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutant, VOC and NO_x, are less than **twenty five (<25) and one hundred (<100) tons per year, respectively.**

Change 7:

Following is the corrected discussion for 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) under the State Rule Applicability - Entire Source section in the TSD:

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This existing source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, and this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset) are each not applicable to the source.

326 IAC 2-3 (Emission Offset)

This source is not a major source for Emission Offset, 326 IAC 2-3. Although this source is located in an 8-hr ozone nonattainment area, the source does not have the potential to emit VOC and NO_x at rates of 25 and 100 tons per year or more, respectively. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Change 8:

Following is the corrected evaluation of rule 326 IAC 2-6 due to the update in source's potential emissions:

326 IAC 2-6 (Emission Reporting)

~~This source is located in Lake County and has the potential to emit more than twenty-five (25) tons of VOC per year. Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits VOC into the ambient air equal to or greater than twenty five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.~~ **Although this source is located in Lake County, the potential to emit volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are each less than twenty-five (25) tons per year. Also, this source is not required to have an operating permit under 326 IAC 2-7. Therefore, 326 IAC 2-6 does not apply.**

Change 9:

Following is the corrected determination of 326 IAC 6-3 rule applicability based on the changes in the equipment descriptions:

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

- (a) Particulate from the one (1) air atomization paint spray room, identified as Line 6 surface coating operation **and Small Parts coating booth**, 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.

- (c) Pursuant to 326 IAC 6-3-1(b)(9), the one (1) welding station, identified as ~~Line 4~~ **Line 3** welding station, consisting of two (2) MIG welders, **one (1) robotic welding station and thirty three (33) MIG welders**, ~~is~~ **are** not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because ~~the~~ **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~~ **two (2) plasma cutting torches and six (6) oxy fuel cutting torches** are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because ~~the one (1) oxyacetylene burning machine~~ **each facility** has potential particulate matter emissions less than 0.551 pounds per hour.

Change 10:

Following is the correct determination of rule 326 IAC 8-2-9 applicability for the coating operations at the source. Pursuant to 326 IAC 8-2-1(1)(4), facilities constructed after July 1, 1990 and located in any county are subject to the rule if the actual VOC emissions exceed fifteen (15) pounds per day. Based on revised emission calculations, Line 6 and Line 3 have been determined to have actual VOC emissions before add on controls of less than 15 pounds per day, therefore, the rule requirements do not apply. However, the Small Parts booth has been determined to be subject to the rule requirements since the actual VOC emissions exceed 15 pounds per day before add on controls. In addition, Line 3 consists of only a dip coating application method and there is no spraying involved. As a result of this determination, Condition D.1.1 has been also revised in the permit which is shown above under Revision 8.

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

~~(b) The one (1) dip coating line, identified as Line 3, constructed after July 1, 1990, has the unrestricted potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the Line 3 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 3 will be able to comply with the rule requirement.~~

(b) Pursuant to 326 IAC 8-2-9(a)(4), the one (1) spray coating line, identified as Line 6, and one (1) dip coating line, identified as Line 3, each constructed after July 1, 1990, are each not subject to the requirements of 326 8-2-9 (Miscellaneous Metal Coating) because the actual VOC emissions are less than fifteen (15) pounds per day before add on controls, each.

(c) The one (1) dip coating line, identified as Line 6, spray coating booth, identified as the Small Parts booth, constructed after July 1, 1990, has the unrestricted potential to emit actual VOC emissions greater than fifteen (15) pounds of VOC per day before add-on controls. Therefore, the Line 6 Small Parts booth 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 Small Parts booth 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 6 Small Parts booth will be able to comply with the rule requirement.

Change 11:

Following is the corrected discussion of rule 326 IAC 8-7 due to changes in emission calculations.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. Even though the source has total potential VOC emissions greater than ten (10) tons per year from the ~~two (2) coating lines~~ **Small Parts booth**, identified as ~~Line 3 and Line 6~~, ~~each~~ **it** is subject to 326 IAC 8-2-9 and, pursuant to 326 IAC 8-7-2 (Applicability), the VOC emitted from ~~these facilities~~ **this facility** is not considered in the rule applicability determination. Excluding emissions from ~~Line 3 and Line 6~~ **the Small Parts booth**, the PTE of VOC from the facilities and source (including ~~Line 4~~ **Lines 3, 4 and 6**) are below the stated rule thresholds and the requirements of 326 IAC 8-7 do not apply.

Change 12:

Following is the corrected description of the source under the Conclusion section of the TSD.

Conclusion

The operation of this ~~box rail car deer parts~~ **parts** fabrication and painting source shall be subject to the conditions of the Minor Source Operating Permit No. 089-24690-00406.

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

Technical Support Document (TSD) for a New Source Review and Minor Source
Operating Permit

Source Background and Description

Source Name:	Stanrail Corporation
Source Location:	1225 Martin Luther King Drive, Gary, Indiana 46402
County:	Lake
SIC Code:	3743
Permit No.:	M089-24690-00406
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed the operating permit application from Stanrail Corporation relating to the box car door fabrication and painting source.

History

On April 20, 2007, Stanrail Corporation submitted an application to the OAQ requesting to modify its operating permit. Stanrail Corporation was issued a Registration permit No. 089-18519-00406 on August 13, 2004. Stanrail Corporation has closed its North Plant located at 201 Mississippi Street, in Gary, Indiana, permitted under a Registration No. 089-15138-00167, issued on February 15, 2002, and moved one (1) surface coating line (Line 6), and three (3) natural gas combustion units from the North plant to this plant at 1225 Martin Luther King Drive, Gary, Indiana 46402. Due to addition of these units, this source will transition to a Minor Source Operating Permit (MSOP) level.

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 4 dip tank (previously identified as Line 2), installed in 1995, capacity: twenty-six (26) uncoupling levers per hour.
- (b) One (1) operation identified as Line 3, consisting of the following:
 - (1) 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.
 - (2) One (1) conveyer line, identified as Line 3 conveyer line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.
 - (3) 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.
- (c) 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.
- (d) One (1) electric resistance welder with no emissions, installed in 2000.

- (e) One (1) rollform area, installed in 1996, consisting of:
 - (1) Two (2) rollformers equipped with electric motors with no emissions.
 - (2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.
 - (3) Uncoilers.
- (f) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.
- (g) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (h) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (i) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.
- (j) Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.

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

The source also consists of the following emission units that were constructed and/or operating without a permit. The following emission units were moved from the North Plant:

- (a) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
 - (1) One (1) metal boxcar parts surface coating line, applying extreme performance coatings with a maximum production rate of 3.5 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
 - (2) One (1) small parts coating booth, with a maximum capacity of 0.5 units per hour, with particulate emissions controlled by a dry filter system exhausting through Line 6 Stack.
 - (3) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven, and one (1) curing oven, each rated at maximum heat input capacity of 1.0 MMBtu per hour.

Emission Units and Pollution Control Equipment Removed From the Source

The following emission units have been removed from the source:

- (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.
- (b) 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.
- (c) 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 pf steel parts per hour.
- (d) 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.

- (e) 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.
- (f) 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.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Registration Construction and Operation Status 089-18519-00406, issued on August 13, 2004.

All conditions from previous approval were incorporated into this permit.

Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit".

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 5).

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM ₁₀	maintenance attainment
PM _{2.5}	nonattainment
SO ₂	maintenance attainment
NO _x	maintenance attainment
8-hour Ozone	moderate nonattainment
CO	maintenance attainment
Lead	attainment

- (a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County, as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. 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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake 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.
- (c) Lake County has been classified as attainment or maintenance attainment 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 - Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Lake County to attainment for the sulfur dioxide standard, and 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 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	27.22
PM-10	27.52
SO ₂	0.03
VOC	38.16
CO	4.40
NO _x	5.30

HAPs	tons/year
Hexane	0.094
Manganese	0.014
Total	0.108

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM10 and VOC is equal to or greater than 25 tons per year. Therefore, the source will be issued an MSOP
- (c) 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/or 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

Pursuant to 326 IAC 2-7-2(e), fugitive emissions are counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

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.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operation (Lines 3, 4 and 6)	0.75	0.75	0.00	37.86	0.00	0.00	0.00
Welding Operation	1.97	1.97	0.00	0.00	0.00	0.00	0.014 (single/total)
Natural Gas Combustion Units	0.10	0.40	0.03	0.30	4.40	5.30	0.094 (single) 0.099 (total)
Total Emissions	2.82	3.12	0.03	38.16	4.40	5.30	0.094 (single) 0.11 (total)

- (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) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutant, VOC and NO_x, are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels) are not included in the permit because each of the four (4) storage vessels have a storage capacity less than 75 cubic meters.
- (c) The requirements of 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) are not included in the permit because the source is not a major source of HAPs.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Air Quality Requirements)

Lake County has been designated as nonattainment for PM_{2.5}. According to an EPA guidance memo dated April 5, 2005, PM-10 is to be utilized as a surrogate for PM_{2.5} until the EPA can promulgate the PM_{2.5} implementation rule. PM₁₀ emissions, and therefore PM_{2.5} emissions, from this source are less than one hundred (100) tons per twelve consecutive month period. There have been no modifications to this source such that it is a major source of PM₁₀ emissions. Therefore, this source is not subject to nonattainment new source review requirements for PM_{2.5} emissions.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This existing source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset) are each not applicable to the source.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This existing source commenced operation prior to July 27, 1997. This source does not have the potential to emit any individual single hazardous air pollutant (HAP) equal to or greater than ten (10) tons per year nor does this source have the potential to emit of equal to or greater than twenty-five (25) tons per year for any combination of HAPs. Therefore, this source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants).

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and has the potential to emit more than twenty-five (25) tons of VOC per year. Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits VOC into the ambient air equal to or greater than twenty five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) 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 is located in Lake County and was constructed after December 13, 1985. However, the fugitive particulate emissions from the paved and unpaved roads and parking lot area are negligible. Pursuant to 326 IAC 6-5-1(b), this source is exempt from the requirements of 326 IAC 6-5.

326 IAC 6.8 (Particulate Emission Limitations for Lake County)

This source is not subject to the requirements of 326 IAC 6.8, because the source is not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11, the source does not have the potential to emit one hundred (100) tons or more per year of particulate matter, and does not have actual emissions of ten (10) tons or more per year of particulate matter.

326 IAC 6.8-10 (Fugitive Particulate Matter Emission Limitations for Lake County)

This source is not subject to the requirements of 326 IAC 6.8-10, because it does not have the potential to emit five (5) tons per year fugitive particulate matter into the atmosphere in Lake County.

State Rule Applicability – Individual Facilities

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

- (a) Particulate from the one (1) air atomization paint spray room, identified as Line 6 surface coating operation, 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), Line 3 and Line 4 dip coating lines 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 one (1) welding station, identified as Line 1 welding station, consisting of two (2) MIG welders, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the 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 forty five (45) natural gas fired space heaters are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because these units do not emit any process related particulate matter emissions.

326 IAC 7-1.1 (Sulfur Dioxide Emissions)

The natural gas fired space heaters at this source are not subject to 326 IAC 7-1.1, because they do not emit SO₂ at a rate equal to or greater than 25 tons per year or 10 pounds per hour.

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

- (a) Pursuant to 326 IAC 8-2-9(a)(4), the one (1) dip coating line, identified as Line 4, constructed after July 1, 1990, is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the Line 4 has potential emissions less than fifteen (15) pounds of VOC per day before add-on controls.
- (b) The one (1) dip coating line, identified as Line 3, constructed after July 1, 1990, has the unrestricted potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the Line 3 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 3 will be able to comply with the rule requirement.

- (c) The one (1) dip coating line, identified as Line 6, constructed after July 1, 1990, has the unrestricted potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the Line 6 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 6 will be able to comply with the rule 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 vessel dimensions.
- (c) The vessel capacity.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. Even though the source has total potential VOC emissions greater than ten (10) tons per year from the two (2) coating lines, identified as Line 3 and Line 6, each is subject to 326 IAC 8-2-9 and, pursuant to 326 IAC 8-7-2 (Applicability), the VOC emitted from these facilities is not considered in the rule applicability determination. Excluding emissions from Line 3 and Line 6, the PTE of VOC from the facilities and source (including Line 4) are below the stated rule thresholds and the requirements of 326 IAC 8-7 do not apply.

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 April 20, 2007. Additional information was received on May 16, 2007.

Conclusion

The operation of this box car door fabrication and painting source shall be subject to the conditions of the Minor Source Operating Permit No. 089-24690-00406.

Appendix A: Emission Calculations

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Permit No.: M089-24690-00406
Reviewer: Adeel Yousuf / EVP
Date: September 18, 2007

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Welding & Cutting	Natural Gas Combustion	TOTAL
PM	53.85	17.60	0.10	71.55
PM10	53.85	17.60	0.40	71.85
SO ₂	0.00	0.00	0.03	0.03
NO _x	0.00	0.00	5.30	5.30
VOC	18.54	0.00	0.30	18.84
CO	0.00	0.00	4.40	4.40
total HAPs	0.00	0.41	0.099	0.51
worst case single HAP	0.00	0.41 (Manganese)	0.094 (Hexane)	0.41 (Manganese)
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Welding & Cutting	Natural Gas Combustion	TOTAL
PM	10.77	17.60	0.10	28.47
PM10	10.77	17.60	0.40	28.77
SO ₂	0.00	0.00	0.03	0.03
NO _x	0.00	0.00	5.30	5.30
VOC	18.54	0.00	0.30	18.84
CO	0.00	0.00	4.40	4.40
total HAPs	0.00	0.41	0.099	0.51
worst case single HAP	0.00	0.41 (Manganese)	0.094 (Hexane)	0.41 (Manganese)

Total emissions based on rated capacity at 8,760 hours/year, after control.

**Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Source ID: 089-00406
Reviewer: Adeel Yousuf / EVP
Date: September 18, 2007

MSOP 24690 calculations, using additional 2007 information:

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 Dip Tank - coating AS APPLIED																
304R3 red primer	9.14	79.64%	70.57%	9.14%	74.32%	13.98%	0.02400	40.000	3.25	0.84	0.802	19.248	3.513	0.00	5.98	100%
Line 4 Dip Tanks - coating as supplied																
328Y2 yellow	10.00	59.14%	54.85%	4.29%	63.13%	31.25%	0.00800	46.700	1.16	0.43	0.160	3.847	0.702	0.00	1.37	100%
328B1 blue	9.16	61.82%	56.46%	5.36%	59.99%	33.50%	0.00800	46.700	1.23	0.49	0.183	4.402	0.803	0.00	1.47	100%
Line 6 Spray Booth - coating as supplied																
300R6 red primer	10.83	40.30%	39.70%	0.60%	52.40%	46.70%	1.20000	4.000	0.14	0.06	0.312	7.486	1.366	47.58	0.14	65%
Eagle Clean degreaser	8.01	28.51%	0.00%	28.51%	0.00%	0.00%	0.11000	4.000	2.28	2.28	1.004	24.104	4.399	0.00		100%
Small Parts Booth - coating as supplied																
324A3 black	8.33	69.48%	50.94%	18.54%	52.34%	25.98%	2.50000	0.500	3.24	1.54	1.930	46.331	8.455	4.87	5.94	65%
304R1D red primer	10.00	59.08%	46.89%	12.19%	54.77%	28.31%	1.00000	1.000	2.70	1.22	1.219	29.256	5.339	6.27	4.31	65%

Potential Emissions:

Potential Emissions after control (80% assumed control efficiency for particulate filters):

4.39 105.42 **18.54** **53.85**
10.77

Note: None of these coating or degreasing materials contain more than trace quantities of Hazardous Air Pollutants (HAPs); most of these materials have no HAP content.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Sum of worst case coatings in each booth or dip tank, plus Line 6 cleaner/degreaser used to prepare parts for coating.

Coatings As Supplied and As Applied:

See next page for As Applied calculations for the Line 3 dip tank.

The coatings for the Line 4 dip tanks are each reduced using 2.5 gallons water to 10 gallons of coating with no other additives. Thinning with just water does not change the pounds VOC per gallon less water,

and the Line 4 coating usage was reported on an As Supplied basis. Therefore, no As Applied calculations were done for the Line 4 dip tank coatings.

All Spray Booth coatings are used As Supplied.

Appendix A: Emissions Calculations
Surface Coating - Paint, as supplied / applied

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Source ID.: 089-00406
Reviewer: Adeel Yousuf / EVP
Date: September 18, 2007

As Applied: 1 gallon of 304R3 is thinned with 1 gallon of the water mix.

	Coating 304R3 (as supplied)	Water	T-39 Waterborne Reducer	505-13 Waterborne Additive	Coating (as applied - see calculations)
Paint/thinner mix (gallons each)	55.25	53.00	2.00	0.25	110.50
Mix ratio, %	50.00	47.96	1.81	0.23	100.00
Density	10.00	8.33	7.25	7.39	9.14
Weight % Volatile (incl. Water)	59.28	100	100	100	79.64
Weight % Water	45.22	100	0	0	70.57
Weight % Organic Volatile	14.06	0	100	100	9.07
Volume % Water	52.71	100	0	0	74.32
Volume % Solids	27.95	0	0	0	13.98

Methodology

Coating information supplied by Carbit Paint company.

Mix ratio information supplied by Stanrail Corporation.

Water mix is made by blending 53 gallons of water with 2 gallons of T-39 Reducer and 1 quart of 505-13 Additive.

Density of Coating as applied = $[(10)(0.5) + (8.33)(0.4796) + (7.25)(0.0181) + (7.39)(0.0023)] = 9.143 \text{ lbs/gal}$

Weight % Volatile as applied = $[(59.28\%)(0.5) + (100\%)(0.4796) + (100\%)(0.0181) + (100\%)(0.0023)] = 79.64\%$

Weight % Water as applied = $[(45.22\%)(0.5) + (100\%)(0.4796) + (0\%)(0.0181) + (0\%)(0.0023)] = 70.57\%$

Weight % Organics as applied = $[(14.06\%)(0.5) + (0\%)(0.4796) + (100\%)(0.0181) + (100\%)(0.0023)] = 9.07\%$

Volume % Water as applied = $[(52.71\%)(0.5) + (100\%)(0.4796) + (0\%)(0.0181) + (0\%)(0.0023)] = 74.315\%$

Volume % Solids as applied = $[(27.95\%)(0.5) + (0\%)(0.4796) + (0\%)(0.0181) + (0\%)(0.0023)] = 13.975\%$

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 No.: M089-24690-00406
Reviewer: Adeel Yousuf / EVP
Date: September 18, 2007

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	5		0.0055	0.0005			0.055	0.005	0.000	0	0.005
Metal Inert Gas (MIG)(carbon steel)	1	12		0.0055	0.0005			0.066	0.006	0.000	0	0.006
Metal Inert Gas (MIG)(carbon steel)	33	5		0.0055	0.0005			0.908	0.083	0.000	0	0.083
Metal Inert Gas (MIG)(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0	0.000
Stick (E7018 electrode)	0	0		0.0211	0.0009			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0	0.000
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	6	2.5	20	0.1622	0.0005	0.0001	0.0003	2.920	0.000	0.000	0.000	0.000
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	2	0.375	150	0.0039				0.070	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								4.02				0.09
Potential Emissions lbs/day								96.44				2.25
Potential Emissions tons/year								17.60				0.41

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 r

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

Appendix A: Emission Calculations

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Permit No.: M089-24690-00406
Reviewer: Adeel Yousuf / EVP
Date: May 17, 2007

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Welding	Natural Gas Combustion	TOTAL
PM	25.15	1.97	0.10	27.22
PM10	25.15	1.97	0.40	27.52
SO ₂	0.00	0.00	0.03	0.03
NO _x	0.00	0.00	5.30	5.30
VOC	37.86	0.00	0.30	38.16
CO	0.00	0.00	4.40	4.40
total HAPs	0.00	0.014	0.099	0.11
worst case single HAP	0.00	0.014 (Manganese)	0.094 (Hexane)	0.094 (Hexane)
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Welding	Natural Gas Combustion	TOTAL
PM	0.75	1.97	0.10	2.82
PM10	0.75	1.97	0.40	3.12
SO ₂	0.00	0.00	0.03	0.03
NO _x	0.00	0.00	5.30	5.30
VOC	37.86	0.00	0.30	38.16
CO	0.00	0.00	4.40	4.40
total HAPs	0.00	0.014	0.099	0.11
worst case single HAP	0.00	0.014 (Manganese)	0.094 (Hexane)	0.094 (Hexane)

Total emissions based on rated capacity at 8,760 hours/year, after control.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Permit No.: M089-24690-00406
Reviewer: Adeel Yousuf / EVP
Date: May 10, 2007

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 Dip Tank																
304R3	9.02	78.05%	69.51%	8.54%	75.21%	13.93%	0.02200	47.000	3.11	0.77	0.796498	19.115963	3.488663	0.00	5.53	100%
Line 4																
328Y2	9.61	59.14%	54.85%	4.29%	63.13%	31.25%	0.00800	26.000	1.12	0.41	0.085752	2.058047	0.375594	0.00	1.32	100%
328B1	8.88	61.82%	56.46%	5.36%	59.99%	33.50%	0.00800	26.000	1.19	0.48	0.099001	2.376032	0.433626	0.00	1.42	100%
Line 6																
304R4	9.76	12.73%	0.00%	12.73%	0.00%	87.27%	0.50000	3.500	1.24	1.24	2.174284	52.182816	9.523364	13.06	1.42	80%
Small Parts (304R1D)	10.00	26.10%	3.00%	23.10%	10.00%	13.00%	2.00000	0.500	2.57	2.31	2.310000	55.440000	10.117800	6.47	17.77	80%
Small Parts (324A3)	8.34	38.49%	8.00%	30.49%	8.00%	45.00%	2.50000	0.500	2.76	2.54	3.178583	76.285980	13.922191	5.62	5.65	80%

Potential Emissions	8.64						207.46		37.86		25.15	
Controlled Potential Emissions												
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr						
	VOC	PM										
Total Controlled Potential Emissions:	0.00%	97.00%	8.64	207.46	37.86	0.75						

Note: There are no emissions of Hazardous Air Pollutants (HAPs) from the above listed coatings.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of worst case coatings in each booth

Appendix A: Welding and Thermal Cutting

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Permit No.: M089-24690-00406
Reviewer: Adeel Yousuf / EVP
Date: May 10, 2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG) (Default)	2	5		0.0055	0.0003	0.0000	0.0000	0.0550	0.0030	0.0000	0.0000	0.003
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)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	2	1.125	18	0.1622	0.0005	0.0001	0.0003	0.394	0.000	0.000	0.000	0.000
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.45	0.00	0.00	0.00	0.00
Potential Emissions lbs/day								10.78	0.07	0.00	0.00	0.07
Potential Emissions tons/year								1.97	0.014	0.000	0.000	0.014

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

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

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" thick)

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

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

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

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

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

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Permit No.: M089-24690-00406
Reviewer: Adeel Yousuf / EVP
Date: May 10, 2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.0	105.1

Heat Input Capacity includes:	Total
One (1) water heater for Line 6	1.00
One (1) dry off oven for Line 6	1.00
One (1) curing oven for Line 6	1.00
Forty five (45) space heaters with each rated at 0.20 MMBtu/hr	9.00

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.1	0.4	0.03	5.3	0.3	4.4

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Stanrail Corporation
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402
Permit No.: M089-24690-00406
Reviewer: Adeel Yousuf / EVP
Date: May 10, 2007

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.104E-04	6.307E-05	3.942E-03	9.461E-02	1.787E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.628E-05	5.782E-05	7.358E-05	1.997E-05	1.104E-04

9.919E-02

Methodology is the same as previous page.

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