



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: October 11, 2007
RE: Progress Rail Services / 089-24989-00381
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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 03/23/06



Mitchell E. Daniels, Jr.
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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Mr. Richard Persiani
Progress Rail Services Corporation
P.O. Box 1037
Albertville, AL 35950

October 11, 2007

Re: 089-24989-00381
First Minor Permit Revision to:
FESOP No. F089-9922-00381

Dear Mr. Persiani:

Progress Rail Services Corporation was issued Federally Enforceable State Operating Permit (FESOP) No. F089-9922-00381 on October 6, 2004 for the operation of a stationary locomotive axle and wheel finishing plant. A letter requesting changes to this permit was received on July 3, 2007. Pursuant to the provisions of 326 IAC 2-8-11.1(d), a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the following:

- (a) Relocation of the existing washers 750, 765, 982, and 1103.
- (b) Removal of the existing washers 059, 1263, and SMPT.
- (c) Replacement of the existing washer FAW (freight axle washer).
- (d) Addition of vent stack (identified as S-50) and wipe cleaning step for Vacuum Process Impregnation (VPI) system.
- (e) Replacement of paint booth AXPB with a new paint booth, identified as TD101.
- (f) Return of small bed blast booth and control (unit 117). This unit was removed in the second Administrative Amendment No. 089-23190-00381, issued on July 26, 2006.
- (g) Addition of an alternative thermal spray operation.
- (h) Relocation of truck (wheel assembly) servicing/repair operation from Chicago, Illinois to this location.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20;

13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached is a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 386-1024 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Original signed by,

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File – Lake County
Lake County Health Department
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development
Technical Support and Modeling
Billing, Licensing and Training Section
IDEM Northwest Regional Office



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

**Progress Rail Services Corporation
175 West Chicago Avenue
East Chicago, Indiana 46312**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F089-9922-00381	
Original Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 6, 2004 Expiration Date: October 6, 2009
First Administrative Amendment 089-21163-00381	Issuance Date: September 23, 2005
Second Administrative Amendment 089-23190-00381	Issuance Date: July 26, 2006
Third Administrative Amendment 089-23708-00381	Issuance Date: November 21, 2006
First Minor Permit Revision No.: 089-24989-00381	Pages Affected: Entire Permit
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 11, 2007 Expiration Date: October 6, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary locomotive axle and wheel set finishing source.

Source Address:	175 West Chicago Avenue, East Chicago, IN 46312
Mailing Address:	P.O. Box 1037, Albertville, AL 35950
General Source Phone:	256-505-6022
SIC Code:	4789
County Location:	Lake
Source Location Status:	Nonattainment for PM _{2.5} and ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD, Emission Offset, and Nonattainment NSR Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) surface coating spray booth, identified as 1213, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 12 metal axles per hour, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-21;
- (b) One (1) surface coating spray booth, identified as 1221, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 3 steel housings per hour or 24 motor exhaust ducts per day, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-20;
- (c) One (1) dip tank with cover, identified as AXDT, constructed in 2000, coating a maximum of 12 metal axles per hour;
- (d) One (1) surface coating spray booth, identified as BPB-1, constructed in 1988, utilizing a HVLP spray application system, coating either steel housings at a maximum rate of 6 per hour, motor exhaust ducts at a maximum rate of 24 per day, or motor housing interiors at a maximum rate of 12 per day, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-1;
- (e) Cold cleaner degreasing operations, consisting of two (2) units constructed in 1988, identified as MPW-1 (exhausting inside) which uses an organic cleaning solvent, and SML-1 (exhausting inside) which uses an aqueous cleaning solvent. These units are not equipped with solvent heaters;
- (f) One (1) degreaser for truck service/repair operation, identified as 865A, approved for construction in 2007, using an organic cleaning solvent, with a maximum capacity of 260 gallons;
- (g) Cold cleaner degreasing operations using heated non-organic cleaners, including an alkaline solution or hot water, consisting of five (5) units constructed in 1988, identified as

750 (stack ID # S-7), 982 (stack ID # S-10), 1103 (stack ID # S-36), 1218 (stack ID # S-22), and 1219 (stack ID # S-19);

- (h) One (1) aqueous washer, identified as FAW, approved for construction in 2007, using up to 3% of defoamer, and exhausting inside the building;
- (i) One (1) conveyORIZED degreasing operations using a heated non-organic alkaline solution, identified as 765, constructed in 1988 (stack ID # S-3);
- (j) One (1) mechanical blasting unit, identified as 617, constructed in 2006, with a maximum capacity of 8000 pounds of steel parts per hour, utilizing one (1) baghouse for particulate matter control, and exhausting to stack S-9;
- (k) One (1) bead blast booth, identified as Unit 117, approved for construction in 2007, with a maximum blast rate of 500 pounds of glass beads per hour, controlled by a baghouse, and exhausting inside the building;
- (l) One (1) grit blast gun for thermal spray operation, identified as TSB, approved for construction in 2007, with a maximum blast rate of 450 pounds of back beauty per hour, controlled by a baghouse (identified as TSBC), and exhausting inside the building;
- (m) One (1) rotoblaster for truck service/repair operation, identified as Unit 1255, approved for construction in 2007, controlled by a baghouse, and exhausting to stack S-44; and
- (n) One (1) grit blast booth for truck service/repair operation, identified as TOBB, approved for construction in 2007, with a maximum blast rate of 750 pounds of black beauty per hour, controlled by baghouse, and exhausting to stack S-45.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) natural gas-fired drying oven, identified as A425, with a maximum heat input rate of 2.3 million British thermal units per hour (MMBtu/hr) and exhausting to four (4) stacks identified as S-37, S-38, S-39 and S40.
- (b) One (1) natural gas-fired carrier furnace, identified as CF-1, with a maximum heat input rate of 0.1 MMBtu/hr.
- (c) One (1) natural gas-fired carrier furnace, identified as CF-2, with a maximum heat input rate of 0.125 MMBtu/hr.
- (d) One (1) natural gas-fired Dayton furnace, identified as DF-1, with a maximum heat input rate of 0.125 MMBtu/hr.
- (e) One (1) natural gas-fired Lennox furnace, identified as LF-1, with a maximum heat input rate of 0.14 MMBtu/hr.
- (f) Sixty seven (67) natural gas-fired radiant space heaters, identified as RH-1 through RH-67, each with a maximum heat input rate of 0.135 MMBtu/hr.
- (g) Five (5) natural gas-fired Trane furnaces, identified as TF-1 through TF-5, each with a maximum heat input rate of 0.25 MMBtu/hr.
- (h) One (1) natural gas-fired Trane furnace, identified as TF-6, with a maximum heat input rate of 0.3 MMBtu/hr.
- (i) Three (3) natural gas-fired water heaters, identified as WH-1, WH-2 and WH-3, each with a maximum heat input rate of 0.2 MMBtu/hr.

- (j) One (1) natural gas-fired solution heater, identified as Solution Heater 750, with a maximum heat input rate of 0.8 MMBtu/hr, and exhausting to one (1) stack, identified as S-8.
- (k) One (1) natural gas-fired solution heater, identified as Solution Heater 765, with a maximum heat input rate of 1.75 MMBtu/hr, and exhausting to one (1) stack, identified as S-2.
- (l) One (1) natural gas-fired solution heater, identified as Solution Heater 982, with a maximum heat input rate of 1.6 MMBtu/hr, and exhausting to one (1) stack, identified as S-11.
- (m) One (1) natural gas-fired solution heater, identified as Solution Heater 1218, with a maximum heat input rate of 0.8 MMBtu/hr, and exhausting to one (1) stack, identified as S-23.
- (n) Paved and unpaved roads and parking lots with public access.
- (o) One (1) propane tank, identified as Propane, with a maximum tank capacity of 1,000 gallons.
- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]
 - (1) Six (6) welding stations utilized as follows:
 - (A) Metal inert gas welding tasks conducted at five (5) stations, with a maximum hourly consumption of 1.0 pound of wire per station;
 - (B) Stick welding tasks conducted at three (3) stations, with a maximum hourly consumption of 0.75 pounds of electrode per station;
 - (C) Tungsten inert gas welding tasks conducted at one (1) station, with a maximum hourly consumption of 1.5 sticks per hour;
 - (2) One (1) flame cutting station utilizing oxyacetylene, with a maximum cutting rate of 18 inches per minute; and
 - (3) One (1) air arc steel cutting station, with an electrode consumption rate of 0.26 pounds per hour.
 - (4) Three (3) MIG welding stations, approved for construction in 2007, each with a maximum consumption of 0.075 pounds of wire per hour.
 - (5) One (1) air arc cutting operation, identified as AAB, approved for construction in 2007, exhausting through stacks S-32 and S-33.
- (q) One (1) Vacuum Process Impregnation (VPI) system, to be installed during November 2006, including a vacuum chamber with a capacity of six (6) locomotive motor armatures, an insulating varnish storage tank containing about 1,200 gallons varnish, and a wipe cleaning operation which uses a maximum of 0.38 gallon of solvent per day, processing up to twelve (12) armatures per day, and exhausting fugitively inside the building during rack removal from the vacuum chamber, through stack S-50 at the end of each impregnation cycle, and through oven A425 stacks S-38 and S-40 during drying/baking. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

- (r) One (1) electrochemical nickel electroplating process, to be installed during 2007, using brush pad applicators, processing up to two and one-half (2.5) axles per hour using a current of approximately 40 ampere-hour to plate each axle. The process also includes one (1) 0.195 MMBtu per hour natural gas fired water evaporator exhausting at stack S-41; and solvent wipe cleaning and brush application of rust protection to plated axles at about 0.04 gallons per 2.5 axles. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

- (s) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
 - (1) One (1) surface coating spray booth, identified as TD101, approved for construction in 2007, utilizing an HVLP spray application system, using dry filters for particulate matter control, and exhausting to stack S-28. [326 IAC 6.8-1-2]
 - (2) One (1) thermal spray gun, identified as TSPG, approved for construction in 2007, controlled by cyclone TSCY and cartridge filter TSC, and exhausting to stack S-42. [326 IAC 6.8-1-2]
 - (3) One (1) paint booth for service/repair operation, identified as TOPB, approved for construction in 2007, controlled by a dry filter, and exhausting to stack S-43. [326 IAC 6.8-1-2]
 - (4) One (1) alkaline aqueous washer, identified as Unit 1239, approved for construction in 2007, equipped with two (2) 0.8 MMBtu/hr natural gas-fired heaters, and exhausting to stacks S-46 and S-47.
 - (5) One (1) alkaline aqueous washer, identified as Unit 1292, approved for construction in 2007, equipped with one (1) 2.5 MMBtu/hr natural gas-fired heater, and exhausting to stacks S-48 and S-49.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.

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

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit 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.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OM&M) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)

Facsimile No.: 317-233-6865

IDEM Northwest Regional Office:
Telephone No.: 219-757-0265
Facsimile No.: 219-757-0267

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)] [326 IAC 2-8-9]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "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, IN 46204-2251

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-3 (Emission Offset) and Nonattainment New Source Review not applicable;
- (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
- (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Fugitive Dust Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 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.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "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.

Testing Requirements [326 IAC 2-8-4(3)]

C.11 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.12 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.14 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.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee’s current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee’s current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter

- with respect to normal, and the results of the response actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) surface coating spray booth, identified as 1213, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 12 metal axles per hour, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-21;
- (b) One (1) surface coating spray booth, identified as 1221, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 3 steel housings per hour or 24 motor exhaust ducts per day, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-20;
- (c) One (1) dip tank with cover, identified as AXDT, constructed in 2000, coating a maximum of 12 metal axles per hour;
- (d) One (1) surface coating spray booth, identified as BPB-1, constructed in 1988, utilizing a HVLP spray application system, coating either steel housings at a maximum rate of 6 per hour, motor exhaust ducts at a maximum rate of 24 per day, or motor housing interiors at a maximum rate of 12 per day, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-1;

The following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (q) One (1) Vacuum Process Impregnation (VPI) system, to be installed during November 2006, including a vacuum chamber with a capacity of six (6) locomotive motor armatures, an insulating varnish storage tank containing about 1,200 gallons varnish, and a wipe cleaning operation which uses a maximum of 0.38 gallon of solvent per day, processing up to twelve (12) armatures per day, and exhausting fugitively inside the building during rack removal from the vacuum chamber, through stack S-50 at the end of each impregnation cycle, and through oven A425 stacks S-38 and S-40 during drying/baking. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]
- (r) One (1) electrochemical nickel electroplating process, to be installed during 2007, using brush pad applicators, processing up to two and one-half (2.5) axles per hour using a current of approximately 40 ampere-hour to plate each axle. The process also includes one (1) 0.195 MMBtu per hour natural gas fired water evaporator exhausting at stack S-41; and solvent wipe cleaning and brush application of rust protection to plated axles at about 0.04 gallons per 2.5 axles. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]
- (s) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
 - (1) One (1) surface coating spray booth, identified as TD101, approved for construction in 2007, utilizing an HVLP spray application system, using dry filters for particulate matter control, and exhausting to stack S-28. [326 IAC 6.8-1-2] [326 IAC 2-3]
 - (2) One (1) paint booth for service/repair operation, identified as TOPB, approved for construction in 2007, controlled by a dry filter, and exhausting to stack S-43. [326 IAC 6.8-1-2] [326 IAC 2-3]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

- (a) 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 three (3) surface coating spray booths (1213, 1221, and BPB-1) and dip tank AXDT shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) 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.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

- (a) The total usage of VOCs, including coatings, dilution solvents, and cleaning solvents, input to the source surface coating operations in Section D.1 and degreasing operations in Section D.2 shall be limited to less than 24.51 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This usage limit is required to limit the VOC emissions from the entire source, including insignificant combustion activities, to less than 25 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable. Compliance with the limit shall also satisfy the requirements of 326 IAC 2-8 and make 326 IAC 2-7 (Part 70) not applicable.
- (b) Compliance with D.1.2(a) shall also make 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), not applicable, with the exception of 326 IAC 8-7-6 (Certification, record keeping, and reporting requirements for coating facilities).

D.1.3 PM Emission Limits [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from each of the paint booths 1213, 1221, BPB-1, TD101, and TOPB shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 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.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Monitoring

- (a) Once per shift inspections shall be performed to verify the placement, integrity and particle loading of the filters and plenums. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the three (3) surface coating spray booth stacks, S-21, S-20, and S-1, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance

with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Quarterly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Inspections required by this condition shall not be performed in consecutive months. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping and Reporting Requirements [326 IAC 8-7]

- (a) Pursuant to 326 IAC 8-7-6, the Permittee shall submit the following certification:
 - (1) the name and address of the source and the name and telephone number of the company representative;
 - (2) identification of each VOC emitting facility together with a description of the purpose each facility serves;
 - (3) a listing of facilities which meet the requirements of 326 IAC 8-7-2(a);
 - (4) baseline actual emissions for each facility identified in 326 IAC 8-7-6(3) together with the following information:
 - (A) maximum design rate, maximum production, or maximum throughput; and
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used; and
 - (5) procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.
- (b) Records required by this rule or records used to demonstrate that a source is exempt from the requirements of this rule shall be submitted to the department, the IDEM Northwest Indiana Office or the U.S. EPA within thirty (30) days of the receipt of a written request. If such records are not available, the source shall be considered subject to the emission limits contained in 326 IAC 8-7-3.
- (c) Sources subject to this rule shall notify the department at least thirty (30) days prior to the addition or modification of a facility which may result in a potential increase in VOC emissions.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below for all the surface coating operations

listed in Section D.1. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the respective VOC emission and usage limits established in Conditions D.1.1 and D.1.2. 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.
 - (2) The amount of coating material and solvent less water used on a monthly 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 solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, once per shift filter/plenum and quarterly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (e) Cold cleaner degreasing operations, consisting of two (2) units constructed in 1988, identified as MPW-1 (exhausting inside) which uses an organic cleaning solvent, and SML-1 (exhausting inside) which uses an aqueous cleaning solvent. These units are not equipped with solvent heaters;
- (f) One (1) degreaser for truck service/repair operation, identified as 865A, approved for construction in 2007, using an organic cleaning solvent, with a maximum capacity of 260 gallons;
- (g) Cold cleaner degreasing operations using heated non-organic cleaners, including an alkaline solution or hot water, consisting of five (5) units constructed in 1988, identified as-750 (stack ID # S-7), 982 (stack ID # S-10), 1103 (stack ID # S-36), 1218 (stack ID # S-22), and 1219 (stack ID # S-19);
- (h) One (1) aqueous washer, identified as FAW, approved for construction in 2007, using up to 3% of defoamer, and exhausting inside the building;
- (i) One (1) conveyORIZED degreasing operations using a heated non-organic alkaline solution, identified as 765, constructed in 1988 (stack ID # S-3);

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

- (a) The total usage of VOCs, including coatings, dilution solvents, and cleaning solvents, input to the source surface coating operations in Section D.1 and degreasing operations in Section 2 shall be limited to less than 24.51 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This usage limit is required to limit the VOC emissions from the entire source, including insignificant combustion activities, to less than 25 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable. Compliance with the limit shall also satisfy the requirements of 326 IAC 2-8 and make 326 IAC 2-7 (Part 70) not applicable.
- (b) Compliance with D.2.1(a) shall also make 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), not applicable, with the exception of 326 IAC 8-7-6 (Certification, record keeping, and reporting requirements for coating facilities).

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for each of the cold cleaner degreasing units MPW-1 and 865A, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and

- (f) 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.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for each of the cold cleaner degreaser operations MPW-1 and 865A, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.

- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.4 Volatile Organic Compounds [326 IAC 8-3-2] [326 IAC 8-3-5] [326 IAC 8-3-4] [326 IAC 8-3-7]

- (a) The Permittee shall not use organic solvents in the five (5) cold cleaner degreasing units identified as 750, 982, 1103, 1218, 1219, and the one (1) conveyORIZED degreasing units identified as 765.
- (b) The actual VOC emissions from aqueous washer FAW, which uses defoamer, shall be less than 15 lbs/day.
- (c) The actual VOC emissions from the aqueous degreasing operation SML-1 shall be less than 15 lbs/day.

Compliance with this condition shall make the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations), 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control) not applicable to the units listed in this condition. Any change or modification which may alter this determination shall require prior approval from the Office of Air Quality (OAQ) before such change can occur.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8(c)(2) (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate the cold cleaner degreaser units MPW-1 and 865A with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements [326 IAC 8-3-8]

- (a) Pursuant to 326 IAC 8-3-8(d)(2), the Permittee shall maintain each of the following records relating to each purchase of solvent used at the cold cleaner degreasers MPW-1 and 865A:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent.
 - (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Pursuant to 326 IAC 8-3-8(e), all records required in paragraph (a) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

D.2.7 Record Keeping and Reporting Requirements [326 IAC 8-7]

- (a) Pursuant to 326 IAC 8-7-6, the Permittee shall submit the following certification for the cold cleaner degreasers identified as MPW-1 and 865A:

- (1) the name and address of the source and the name and telephone number of the company representative;
 - (2) identification of each VOC emitting facility together with a description of the purpose each facility serves;
 - (3) a listing of facilities which meet the requirements of 326 IAC 8-7-2(a);
 - (4) baseline actual emissions for each facility identified in 326 IAC 8-7-6(3) together with the following information:
 - (A) maximum design rate, maximum production, or maximum throughput; and
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.
 - (5) procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.
- (b) Records required by this rule or records used to demonstrate that a source is exempt from the requirements of this rule shall be submitted to the department, the IDEM Northwest Indiana Office or the U.S. EPA within thirty (30) days of the receipt of a written request. If such records are not available, the source shall be considered subject to the emission limits contained in 326 IAC 8-7-3.
- (c) Sources subject to this rule shall notify the department at least thirty (30) days prior to the addition or modification of a facility which may result in a potential increase in VOC emissions.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below for the degreasing units listed in Section D.2 which use VOC containing solvents or cleaning solutions. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of the degreasing solvent used;
 - (2) The amount of the VOC degreasing solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.4(b) and D.2.4(c), the Permittee shall maintain daily records in accordance with (1) through (3) below for washer FAW and degreasing operation SML-1 when VOC containing solutions are used in these units. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limit established in Conditions

D.2.4(b) and D.2.4(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of the defoamer or organic solvent used.
 - (2) The amount of the defoamer or organic solvent used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC emissions per day.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(j) One (1) mechanical blasting unit, identified as 617, constructed in 2006, with a maximum capacity of 8000 pounds of steel parts per hour, utilizing one (1) baghouse for particulate matter control, and exhausting to stack S-9;

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 PM Emission Limits [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from the blasting unit 617 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.3.2 Particulate (PM) and PM10 [326 IAC 2-8][326 IAC 2-3]

The PM and PM10 emitted from the following processes shall be limited as follows:

Emission Unit	Allowable PM Emission Rate (lb/hr)	Allowable PM10 Emission Rate (lb/hr)
Mechanical Blaster (617)	9.15	9.15

These limits are required to limit the potential to emit of PM and PM10 of the source, including other significant and insignificant activities, to less than 100 tons per twelve (12) consecutive month period. Compliance with these limits shall make the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-3 (Emission Offset) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for mechanical blaster 617 and its control device.

Compliance Determination Requirements

D.3.4 Particulate and PM10 Control

In order to comply with D.3.1 and D.3.2, the baghouse for particulate and PM10 control shall be in operation and control emissions from the abrasive blasting unit at all times that mechanical blasting unit 617 is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Visible Emissions Notations

- (a) Visible emission notations of mechanical blasting unit 617 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with mechanical blasting unit 617, at least once per shift when the mechanical blasting unit is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling mechanical blasting unit 617 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of once per shift visible emission notations of the mechanical blasting unit 617 stack exhaust.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and the dates the vents are redirected.
- (d) To document compliance with Condition D.3.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]
 - (1) Six (6) welding stations utilized as follows:
 - (A) Metal inert gas welding tasks conducted at five (5) stations, with a maximum hourly consumption of 1.0 pound of wire per station;
 - (B) Stick welding tasks conducted at three (3) stations, with a maximum hourly consumption of 0.75 pounds of electrode per station;
 - (C) Tungsten inert gas welding tasks conducted at one (1) station, with a maximum hourly consumption of 1.5 sticks per hour;
 - (2) One (1) flame cutting station utilizing oxyacetylene, with a maximum cutting rate of 18 inches per minute; and
 - (3) One (1) air arc steel cutting station, with an electrode consumption rate of 0.26 pounds per hour.
 - (4) Three (3) MIG welding stations, approved for construction in 2007, each with a maximum consumption of 0.075 pounds of wire per hour.
 - (5) One (1) air arc cutting operation, identified as AAB, approved for construction in 2007, exhausting through stacks S-32 and S-33.
- (s) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
 - (3) One (1) thermal spray gun, identified as TSPG, approved for construction in 2007, controlled by cyclone TSCY and cartridge filter TSC, and exhausting to stack S-42. [326 IAC 6.8-1-2]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 PM Emission Limits [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from each of welding and cutting stations and thermal spray gun TSPG shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).

SECTION D.5 FACILITY OPERATION CONDITIONS – Blasting Units 117, TSB, 1255, and TOBB

Facility Description [326 IAC 2-8-4(10)]

- (k) One (1) bead blast booth, identified as Unit 117, approved for construction in 2007, with a maximum blast rate of 500 pounds of glass beads per hour, controlled by a baghouse, and exhausting inside the building;
- (l) One (1) grit blast gun for thermal spray operation, identified as TSB, approved for construction in 2007, with a maximum blast rate of 450 pounds of back beauty per hour, controlled by a baghouse (identified as TSBC), and exhausting inside the building;
- (m) One (1) rotoblaster for truck service/repair operation, identified as Unit 1255, approved for construction in 2007, controlled by a baghouse, and exhausting to stack S-44; and
- (n) One (1) grit blast booth for truck service/repair operation, identified as TOBB, approved for construction in 2007, with a maximum blast rate of 750 pounds of black beauty per hour, controlled by baghouse, and exhausting to stack S-45.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 PM/PM10 Emission Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following PM/PM10 emission limits for blasting units 117, TSB, 1255, and TOBB:

Unit ID	Unit Description	PM/PM10 Emission Limits (lbs/hr)
117	Bead Blast Booth	0.04
TSB	Grit Blasting Unit	0.04
1255	Rotoblaster Unit	0.04
TOBB	Grit Blasting Unit	0.06

Compliance with these limits, combined with the PM/PM10 emissions from all other units at this source, shall limit the source-wide potential to emit PM and PM10 to less 250 tons and 100 tons per year, respectively, and render the requirements of 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-2 (PSD), and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.5.2 Minor Permit Revision Limits [326 IAC 2-8-11.1(d)]

Pursuant to 326 IAC 2-8-11.1(d)(5)(C) (Minor Permit Revision), the Permittee shall comply with the following for the baghouses associated with blasting units 117, TSB, 1255, and TOBB:

- (a) Achieving and maintaining 99% efficiency.
- (b) No visible emissions.

Compliance with these requirements shall render the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable.

D.5.3 PM Emission Limits [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from each of the blasting units 117, TSB, 1255, and TOBB shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.5.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.5.5 Particulate Control

- (a) In order to comply with Conditions D.5.1 through D.5.3, each of the blasting units 117, TSB, 1255, and TOBB shall be controlled by the associated baghouse when the unit is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.6 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts from baghouse stack exhausts from blasting units 1255 and TOBB shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are visible.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If any visible emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

D.5.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with blasting units 117, TSB, 1255, and TOBB, at least once per day when these units are in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal ranges listed in the table below or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

Emission Unit ID	Pressure Drop Range (inches of water)	Emission Point
117	0.5 - 6.5	Inside the building
TSB	0.5 - 6.5	Inside the building
1255	0.5 - 6.5	Stack S-44
TOBB	0.5 - 6.5	Stack S-45

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.5.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.9 Record Keeping Requirements

- (a) To document compliance with Condition D.5.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) 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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Progress Rail Services Corporation
Source Address: 175 West Chicago Avenue, East Chicago, IN 46312
Mailing Address: P.O. Box 1037, Albertville, AL 35950
FESOP No.: F089-9922-00381

**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:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Progress Rail Services Corporation
Source Address: 175 West Chicago Avenue, East Chicago, IN 46312
Mailing Address: P.O. Box 1037, Albertville, AL 35950
FESOP No.: F089-9922-00381

This form consists of 2 pages

Page 1 of 2

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Progress Rail Services Corporation
Source Address: 175 West Chicago Avenue, East Chicago, IN 46312
Mailing Address: P.O. Box 1037, Albertville, AL 35950
FESOP No.: F089-9922-00381
Facility: Surface coating operations (1213, 1221, AXDT, BPB-1, TD101, and TOPB), VPI system, axle plating operation, and degreasing operations (MPW-1 and SML-1, 865A, and FAW)
Parameter: VOC usage
Limit: Less than 24.51 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	VOC Usage this Month	VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Progress Rail Services Corporation
Source Address: 175 West Chicago Avenue, East Chicago, IN 46312
Mailing Address: P.O. Box 1037, Albertville, AL 35950
FESOP No.: F089-9922-00381

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name: Progress Rail Services Corporation
Source Location: 175 West Chicago Avenue, East Chicago, Indiana 46312
County: Lake
SIC Code: 4789
Operation Permit No.: F089-9922-00381
Operation Permit Issuance Date: October 6, 2004
Minor Permit Revision No.: 089-24989-00381
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed a revision application from Progress Rail Services Corporation relating to the operation of locomotive axle and wheel finishing plant.

Existing Approvals

The source was issued FESOP No. 089-9922-00381 on October 6, 2004. The source has since received the following approvals:

- (a) First Administrative Amendment No.: 089-21163-00381, issued on September 23, 2005.
- (b) Second Administrative Amendment No.: 089-23190-00381, issued on July 26, 2006.
- (c) Third Administrative Amendment No.: 089-23708-00381, issued on November 21, 2006.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. 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 a surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone standards. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) 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.
- (d) Lake County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) Fugitive Emissions
This type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980. Therefore, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	19.8
PM10	20.1
SO ₂	0.05
VOC	24.0
CO	7.15
NO _x	8.51

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because potential to emit VOC is limited to less than 25 tons per year and the potential to emit NO_x is less than 100 tons per year.
- (c) This existing source is not a major stationary source under Nonattainment NSR (326 IAC 2-1.1-5) because no Nonattainment NSR regulated pollutant is emitted at a rate of 100 tons per year or more.

- (d) These emissions are based upon the technical support document for F089-9922-00381, issued on October 6, 2004.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
TOTAL	5.35

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

Progress Rail Services Corporation is an existing locomotive axle and wheel finishing plant and is operating under FESOP #089-9922-00381, issued on October 6, 2004. On July 3, 2007, the Permittee submitted an application requesting the following changes to the existing plant. Additional information was submitted on August 21, 2007, September 6, 2007, and September 17, 2007.

- (a) Relocation of the existing washers 750, 765, 982, and 1103. These units will be relocated closer to the operations they support or are planned to support. These changes will not result in emission increase from the existing plant and will not affect the description for these units in the existing permit.
- (b) Removal of the existing washers 059, 1263, and SMPT. The natural gas-fired heater associated with washer SMPT has been removed also.
- (c) Replacement of the existing washer FAW (freight axle washer). The cleaning solution contains no VOCs but the defoamer contains a small amount of VOC. In addition, hot water is no longer needed for this new washer, so the Solution Heater FAW listed under Condition A.3(q) has been removed from this source.
- (d) Addition of vent stack (identified as S-50) and wipe cleaning step for the Vacuum Process Impregnation (VPI) system.

According to the third Administrative Amendment No. 089-23708-00381, issued on November 21, 2006, the PTE of existing VPI system is 3.07 tons/yr + 0.114 tons/yr = 3.18 tons/yr of VOC. There are no HAP emissions from the existing VPI system.

The PTE of the additional wipe cleaning operation is 0.34 tons/yr of VOC and 0.14 tons/yr of HAPs (see the calculations in Appendix A). With the emissions from the additional wipe cleaning operation, the potential to emit VOC from the entire VPI system is 3.18 tons/yr + 0.34 tons/yr = 3.52 tons/yr. Therefore, this VPI system remains an insignificant unit as the PTE of this unit is less than 3 pounds per hour (which is equivalent to 13.1 tons per year), pursuant to 327 IAC 2-7-1(21).

- (e) Replacement of paint booth AXPB with a new paint booth, identified as TD101. However, the dip tank (AXTD) associated with booth AXPB will remain on site. The new paint booth TD101 will vent to existing stack S-28 and will be controlled by dry filters. This new paint booth has potential to emit VOC/HAP less than the insignificant unit thresholds in 326 IAC 2-7-1(21). Therefore, paint booth TD101 is considered an insignificant unit.
- (f) Return of small bed blast booth and control (unit 117). This unit was removed in the second Administrative Amendment No. 089-23190-00381, issued on July 26, 2006. This unit was described as follows in T089-9922-00381, issued on October 6, 2004.

One (1) pneumatic blasting unit, identified as 117, with a maximum capacity of 180 pounds per hour (exhausting to baghouse that vents inside), constructed in 1988, utilizing one (1) baghouse for particulate mater control.

The Permittee wishes to return this unit to the facility and modify it to allow specialized blasting of selected parts of some armatures to support the VPI system. This unit is considered an insignificant unit, pursuant to 327 IAC 2-7-1(21).

- (g) Addition of an alternative thermal spray operation. The Permittee plans to install a wire-arc thermal spray operation to as an alternative, and possibly replacement for the existing electrochemical nickel plating operation. This thermal spray operation will be an alternative to the electrochemical nickel plating, but the process will include additional emissions from the following new units:
- (1) One (1) grit blasting unit, identified as TSB, with a maximum grit usage of 450 pounds per hour, and controlled by a baghouse (identified as TSBC).
 - (2) One (1) spray operation, using a HVLP spray gun and identified as TSPG, controlled by cyclone TSCY and cartridge filter TSC, and exhausting to stack S-42.
- (h) Relocation of truck (wheel assembly) servicing/repair operation from Chicago, Illinois to this location. The maximum throughput rate for this operation is 1.8 trucks per day. This operation will require the relocation of the following equipment from Chicago, Illinois:
- (1) One (1) paint booth, identified as TOPB, controlled by a dry filter, and exhausting to stack S-43.
 - (2) One (1) rotoblaster, identified as Unit 1255, controlled by a baghouse, and exhausting to stack S-44.
 - (3) One (1) blast booth, identified as TOBB, controlled by a cartridge baghouse, and exhausting to stack S-45.
 - (4) One (1) solvent degreaser, identified as 865A, with a maximum capacity of 260 gallons.
 - (5) Welding/cutting equipment, to be located in Building A, including three (3) MIG welding stations and one (1) air arc cutting operation, exhausting through stacks S-32 and S-3.
 - (6) One (1) alkaline aqueous washer, identified as Unit 1239, equipped with two (2) 0.8 MMBtu/hr natural gas-fired heaters, and exhausting to stacks S-46 and S-47.
 - (7) One (1) alkaline aqueous washer, identified as Unit 1292, equipped with one (1) 2.5 MMBtu/hr natural gas-fired heater, and exhausting to stacks S-48 and S-49.
- (i) The Permittee stated that the existing cold cleaner degreasing operation SML-1 only uses aqueous cleaning solvent and the actual VOC emissions from this unit are less than 15 lbs/day. Therefore, this unit is not subject to the requirements of 326 IAC 8-3-2, 8-3-5, and 8-3-8 and should be removed from Conditions D.2.2, D.2.3, and D.2.4.

Upon further review, IDEM has determined that the PM emissions from this source are subject to the requirements of 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County) since this source is located in Lake county and has uncontrolled potential to emit PM greater than 100 tons per year. All the PM conditions referred to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) have been replaced with the requirements of 326 IAC 6.8-1.

Enforcement Issues

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 14).

Permit Level Determination – FESOP Revision

Pursuant to 326 IAC 2-7-1(29), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	PTE of revision (tons/year)
PM	93.6
PM10	71.4
SO ₂	0.01
VOC	4.62
CO	1.48
NO _x	1.76
Total HAPs	1.11

The Permittee has elected to limit the PM/PM10 emissions from this revision to less than 25 tons per year by using particulate air pollution control devices which have minimum control efficiencies of 99% and have no visible emissions. Therefore, this modification is considered a Minor Permit Revision to the existing FESOP, pursuant 326 IAC 2-8-11.1(d)(5)(C).

Permit Level Determination – FESOP

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, 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	PM10	SO ₂	VOC	CO	NO _x	HAPs
PTE of this Revision	Less than 2.58	Less than 2.46	0.01	Less than 25.0	1.48	1.76	1.11
PTE of the Existing Units*	Less than 19.8	Less than 20.5	0.05		7.15	8.51	5.35
Total PTE of the Entire Source after Revision	Less than 22.4	Less than 23.0	0.06	Less than 25.0	8.63	10.3	6.46
TV Major Thresholds	NA	100	100	25	100	25	10 for a single HAP and 25 for total HAPs

Note: “-” pollutant not emitted by the facility.

* The PTE information for the existing units is from the TSD for F089-9922-00381, issued on October 6, 2004.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12, and 40 CFR Part 60) included in this revision.
- (b) Railcars are not considered automobiles or light duty trucks. Therefore, The New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60.390 - 60.398, Subpart MM) are not included in this revision.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 20, and 40 CFR Part 61 and 63) included in this revision.
- (d) This existing source is not a major source for HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Miscellaneous Metal Parts and Products Surface Coating (40 CFR 63, Subpart MMMM) are not included in this revision.
- (e) The solvents used in the proposed washers or degreaser do not contain any halogenated HAP as defined in 40 CFR 63.460. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63.460 - 63.470, Subpart T) are not included in this revision.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

This existing source was constructed in 1988 and is located in Lake County, which is a nonattainment area for the 8-hour ozone standard and was a severe nonattainment area for the 1-hour ozone standard. The potential to emit NO_x from the entire source is less than 100 tons per year and the potential to emit VOC from the entire source is limited to less than 25 tons per year. Therefore, the existing source is an Emission Offset minor source. The potential to emit of this revision is less than 25 tons per year for VOC and less than 100 tons per year for NO_x. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable to this revision.

After this revision, the VOC usage in all the surface coating operations and all the degreasing operations at this source will still be limited to less than 24.51 tons per year, which is an emission limit established in F089-9922-00381, issued on October 6, 2004. Combined with the VOC emissions from the insignificant combustion units, the VOC emissions from the entire source are still limited to less than 25 tons per year. Therefore, this source remains an Emission Offset minor source.

326 IAC 2-8-4 (FESOP), 326 IAC 2-1.1-5 (Nonattainment NSR) and 326 IAC 2-2 (PSD)

This existing source was constructed in 1988 and is located in Lake County, which is a

nonattainment area for PM_{2.5}. The OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. The uncontrolled potential to emit from the existing source is greater than 100 tons per year for PM₁₀ and greater than 250 tons per year for PM. In order to maintain the FESOP status and to render the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following PM/PM₁₀ emission limits for blasting units 117, TSB, 1255, and TOBB:

Unit ID	Unit Description	PM/PM ₁₀ Emission Limits (lbs/hr)
117	Bead Blast Booth	0.04
TSB	Grit Blasting Unit	0.04
1255	Rotoblaster Unit	0.04
TOBB	Grit Blasting Unit	0.06

This is equivalent to 0.79 tons per year of PM/PM₁₀ emissions from these new blasting units. The use of baghouses with these blasting units ensures compliance with the limits in the table above. Combined with the emissions from the proposed surface coating operations and the existing units, the potential to emit from the entire source after this revision is still limited to less than 100 tons per year for PM₁₀ and less than 250 tons per year for PM.

The uncontrolled potential to emit SO₂ and CO of the existing source is less than 100 tons per year. Combined with the potential to emit of this revision, the potential to emit of SO₂ and CO from the entire source still remains less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit) are not applicable and this source remains an Nonattainment NSR and PSD minor source.

326 IAC 2-8-11.1(d) (Minor Permit Revision)

The uncontrolled potential to emit PM/PM₁₀ of this revision is greater than 25 tons per year but less than 100 tons per year. The Permittee has elected to operate particulate control devices with the proposed blasting units (Units 117, TSB, 1255, and TOBB) to limit the potential to emit PM/PM₁₀ from this revision to less than 25 tons per year. Pursuant to 326 IAC 2-8-11.1(d)(5)(C), the Permittee shall comply with the following for the baghouses associated with blasting units 117, TSB, 1255, and TOBB:

- (a) Achieving and maintaining 99% efficiency.
- (b) No visible emissions.

Therefore, the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) are not applicable to this revision.

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

The uncontrolled potential to emit of this revision is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 5-1 (Opacity Limitations)

This source is located in Lake County. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity for sources 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.

State Rule Applicability – Blasting Units

326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)

This railcar service plant is located in Lake County. The emissions from this plant are not specifically regulated under 326 IAC 6.8-2 through 6.8-11. However, this railcar service plant has potential uncontrolled PM emissions greater than 100 tons per year. Pursuant to 326 IAC 6.8-1-2 (a), PM emissions from each of the proposed blasting units (Units 117, TSB, 1255, and TOBB) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). The use of baghouses with these units ensures compliance with the PM emission limits in 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County).

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

Since PM emissions from the proposed blasting units (Units 117, TSB, 1255, and TOBB) are subject to the requirements of 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County), the emissions from the proposed blasting units are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(c)(3).

State Rule Applicability – Surface Coating Operations

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

The potential to emit VOC from each of the paint booths TD101 and TOPB are less than 15 pounds per day, which is equivalent to 2.74 tons/yr of VOC. The thermal spray gun TSPG applies metal to the axles and does not generate VOC emissions. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are not applicable to units TD101, TOPB, and TSPG.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from each of the proposed paint booths Units TD101 and TOPB are less than 25 tons per year. The proposed thermal spray gun TSPG does not have VOC emissions. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable to Units TD101, TOPB, and TSPG.

326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)

This railcar service plant is located in Lake County. The emissions from this plant are not specifically regulated under 326 IAC 6.8-2 through 6.8-11. However, this railcar service plant has potential uncontrolled PM emissions greater than 100 tons per year. Pursuant to 326 IAC 6.8-1-2 (a), PM emissions from each of the proposed paint booths (Units TD101, TSPG and TOPB) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

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

Since PM emissions from the proposed paint booths (Units TD101, TSPG and TOPB) are subject to the requirements of 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County), the emissions from the proposed paint booths are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(c)(3).

State Rule Applicability – Washers and Degreasing Operations

326 IAC 8-1 (Volatile Organic Compound Rules)

Washer FAW is aqueous washer and a small amount of defoamer will be added to this washer. The defoamer does contain VOC but the actual VOC emissions from this washer will be less than 15 lbs/day. In addition, the existing degreasing operation SML-1 uses aqueous cleaning solution and the actual VOC emissions from this unit are less than 15 lbs/day. Therefore, washer FAW and the degreasing operation SML-1 are exempt from the requirements of 326 IAC 8(Volatile Organic Compound Rules), pursuant to 326 IAC 8-1-1(b). The Permittee shall keep records on the daily VOC emissions from these units to demonstrate that the actual VOC emissions from each of these units are less than 15 lbs/hr.

326 IAC 8-3-2 (Cold Cleaning Operations)

Any degreaser using VOC containing solvents is considered a cold cleaning operation. The degreaser Unit 865A will be constructed after January 1, 1980 and are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) 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.

Washers Units 1239 and 1292 do not use any VOC containing solvents. Therefore, these units are not subject to the requirements of 326 IAC 8-3-2 (Cold Cleaning Operations).

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The parts cleaning stations, which use VOC containing solvents, were constructed after July 1, 1990 and do not have remote solvent reservoirs. Therefore, the proposed degreaser Unit 865A is subject to 326 IAC 8-3-5 and must be operated in compliance with the following requirements:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Washers Units 1239 and 1292 do not use any VOC containing solvents. Therefore, these units are not subject to the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).

326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers)

This source is located in Lake County. Therefore, the proposed degreaser Unit 865A, which is considered a cold cleaning degreaser, is subject to the requirements in 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers). The Permittee shall comply with the following for the proposed degreaser Unit 865A :

- (a) Pursuant to 326 IAC 8-3-8(c)(2)(B), on and after May 1, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Pursuant to 326 IAC 8-3-8(d)(2), on and after November 1, 1999, the Permittee shall maintain each of the following records for each purchase:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent.
 - (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) Pursuant to 326 IAC 8-3-8(e), all records required by 326 IAC 8-3-8(d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

State Rule Applicability – Welding and Cutting Equipment

326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)

This railcar service plant is located in Lake County. The emissions from this plant are not specifically regulated under 326 IAC 6.8-2 through 6.8-11. However, this railcar service plant has potential uncontrolled PM emissions greater than 100 tons per year. Pursuant to 326 IAC 6.8-1-2(a), PM emissions from each of the proposed welding and cutting equipment shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

Since PM emissions from the proposed welding and cutting equipment are subject to the requirements of 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County), the emissions from the proposed welding and cutting equipment are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(c)(3).

Testing Requirements

Stack testing is not required because all the proposed blasting units (Units 117, TSB, 1255, and TOBB) will be controlled by baghouses and the Permittee is required to monitor the visible emissions and the pressure drop readings for the baghouses to ensure the control devices will be operated properly.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The proposed blasting units (Units 117, TSB, 1255, and TOBB), which will be equipped with the baghouses, have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the baghouse stack exhausts from blasting units 1255 and TOBB shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1)

month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. shall be considered a deviation from this permit.

- (b) The Permittee shall record the pressure drop across the baghouses used in conjunction with basting units 117, TSB, 1255, and TOBB, at least once per day when these units are in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal ranges listed in the table below or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

Emission Unit ID	Pressure Drop Range (inches of water)	Emission Point
117	0.5 - 6.5	Inside the building
TSB	0.5 - 6.5	Inside the building
1255	0.5 - 6.5	Stack S-44
TOBB	0.5 - 6.5	Stack S-45

- (c) In the event that bag failure has been observed:
 - (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the baghouses used to control particulate emissions from the proposed blasting units (Units 117, TSB, 1255, and TOBB) must operate properly to ensure compliance with 326 IAC 2-8-4 (FESOP), 326 IAC 2-8-11.1(d) (Minor Permit Revision), and 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County).

Proposed Changes

The changes listed below have been made to FESOP No. 089-9922-00381. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. The specific mail codes (MC) for each of the IDEM branches have been added to improve mail delivery, as follows:

Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Air Compliance Section: **MC 61-53 IGCN 1003**
Compliance Data Section: **MC 61-52 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**

2. IDEM has determined that it is no longer necessary to list the authorized individual in the permit. In addition, this existing source a PSD minor source and is not in one of the 28 source categories. Therefore, Condition A.1 has been revised as follow:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary locomotive axle and wheel set finishing source.

~~Authorized Individual: _____ Director of Environmental Services~~

...

Source Status: Federally Enforceable State Operating Permit (FESOP)
 Minor Source, under **PSD**, Emission Offset, and Nonattainment
 NSR Rules
 Minor Source, Section 112 of the Clean Air Act
 Not in 1 of 28 Source Categories

3. All the conditions in FESOP are federally enforceable. Therefore, Condition C.10 has been revised as follows:

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

...

- (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.~~

4. IDEM has made the following revisions to Condition C.19:

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

...

- (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 and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

...

5. The following changes are the result of the proposed modifications:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) surface coating spray booth, identified as 1213, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 12 metal axles per hour, using dry

- filters for particulate matter control, and exhausting to one (1) stack, identified as S-21;
- (b) One (1) surface coating spray booth, identified as 1221, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 3 steel housings per hour or 24 motor exhaust ducts per day, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-20;
- (c) ~~One (1) surface coating spray booth, identified as AXPB, constructed in March 2000, utilizing either a HVLP spray application system or a dip tank reservoir with cover, identified as AXDT, constructed in 2000, coating a maximum of 12 metal axles per hour, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-28;~~
- ...
- (f) **One (1) degreaser for truck service/repair operation, identified as 865A, approved for construction in 2007, using an organic cleaning solvent, with a maximum capacity of 260 gallons;**
- ~~(f)~~(g) Cold cleaner degreasing operations using heated non-organic cleaners, including an alkaline solution or hot water, consisting of the following:
- (1) ~~Seven (7) five (5) units constructed in 1988, identified as 059 (stack ID # S-34), 750 (stack ID # S-7), 982 (stack ID # S-10), 1103 (stack ID # S-36), 1218 (stack ID # S-22), and 1219 (stack ID # S-19), 1263 (stack ID # S-12); and;~~
- (2) ~~One (1) unit constructed in 2002, identified as identified as FAW (stack ID # 35).~~
- (h) **One (1) aqueous washer, identified as FAW, approved for construction in 2007, using up to 3% of defoamer, and exhausting inside the building;**
- ~~(g)~~(i) **One (1) conveyorized degreasing operations using a heated non-organic alkaline solution, consisting of two (2) units identified as 765, constructed in 1988 (stack ID # S-3); and SMPT, constructed in 2000 (stack ID # S-26);**
- ~~(h)~~(j) One (1) mechanical blasting unit, identified as 617, constructed in 2006, with a maximum capacity of 8000 pounds of steel parts per hour, utilizing one (1) baghouse for particulate matter control, and exhausting to stack S-9;
- (k) **One (1) bead blast booth, identified as Unit 117, approved for construction in 2007, with a maximum blast rate of 500 pounds of glass beads per hour, controlled by a baghouse, and exhausting inside the building;**
- (l) **One (1) grit blast gun for thermal spray operation, identified as TSB, approved for construction in 2007, with a maximum blast rate of 450 pounds of back beauty per hour, controlled by a baghouse (identified as TSBC), and exhausting inside the building;**
- (m) **One (1) rotoblaster for truck service/repair operation, identified as Unit 1255, approved for construction in 2007, controlled by a baghouse, and exhausting to stack S-44; and**
- (n) **One (1) grit blast booth for truck service/repair operation, identified as TOBB, approved for construction in 2007, with a maximum blast rate of 750 pounds of black beauty per hour, controlled by baghouse, and exhausting to stack S-45.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

...

~~(n)~~ One (1) natural gas fired solution heater, identified as Solution Heater SMPT, with a maximum heat input rate of 2.0 MMBtu/hr, and exhausting to one (1) stack, identified as S-25.

~~(n)~~ Paved and unpaved roads and parking lots with public access.

~~(o)~~ One (1) propane tank, identified as Propane, with a maximum tank capacity of 1,000 gallons.

~~(q)~~ One (1) natural gas fired solution heater, identified as Solution Heater FAW, with a maximum heat input rate of 1.5 MMBtu/hr, and exhausting to one (1) stack, identified as # 34.

~~(p)~~ The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
[326 IAC 6.8-1-2]

...

(3) One (1) air arc steel cutting station, identified as AAB (stack ID # S-32 and S-33), with an electrode consumption rate of 0.26 pounds per hour.

(4) **Three (3) MIG welding stations, approved for construction in 2007, each with a maximum consumption of 0.075 pounds of wire per hour.**

(5) **One (1) air arc cutting operation, identified as AAB, approved for construction in 2007, exhausting through stacks S-32 and S-33.**

~~(q)~~ One (1) Vacuum Process Impregnation (VPI) system, to be installed during November 2006, including a vacuum chamber with a capacity of six (6) locomotive motor armatures, and an insulating varnish storage tank containing about 1,200 gallons varnish, **and a wipe cleaning operation which uses a maximum of 0.38 gallon of solvent per day**, processing up to twelve (12) armatures per day, and exhausting fugitively inside the building during rack removal from the vacuum chamber, **through stack S-50 at the end of each impregnation cycle**, and through oven A425 stacks S-38 and S-40 during drying/baking. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

~~(r)~~ One (1) electrochemical nickel electroplating process, to be installed during 2007, using brush pad applicators, processing up to two and one-half (2.5) axles per hour using a current of approximately 40 ampere-hour to plate each axle. The process also includes one (1) 0.195 MMBtu per hour natural gas fired water evaporator exhausting at stack S-41; and solvent wipe cleaning and brush application of rust protection to plated axles at about 0.04 gallons per 2.5 axles. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

(s) **Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:**

(1) **One (1) surface coating spray booth, identified as TD101, approved for construction in 2007, utilizing an HVLP spray application system, using dry filters for particulate matter control, and exhausting to stack S-28. [326 IAC**

6.8-1-2] [326 IAC 2-3]

- (2) **One (1) paint booth for service/repair operation, identified as TOPB, approved for construction in 2007, controlled by a dry filter, and exhausting to stack S-43. [326 IAC 6.8-1-2] [326 IAC 2-3]**
- (3) **One (1) thermal spray gun, identified as TSPG, approved for construction in 2007, controlled by cyclone TSCY and cartridge filter TSC, and exhausting to stack S-42. [326 IAC 6.8-1-2]**
- (4) **One (1) alkaline aqueous washer, identified as Unit 1239, approved for construction in 2007, equipped with two (2) 0.8 MMBtu/hr natural gas-fired heaters, and exhausting to stacks S-46 and S-47.**
- (5) **One (1) alkaline aqueous washer, identified as Unit 1292, approved for construction in 2007, equipped with one (1) 2.5 MMBtu/hr natural gas-fired heater, and exhausting to stacks S-48 and S-49.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) surface coating spray booth, identified as 1213, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 12 metal axles per hour, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-21;
- (b) One (1) surface coating spray booth, identified as 1221, constructed in 1988, utilizing an HVLP spray application system, coating a maximum of 3 steel housings per hour or 24 motor exhaust ducts per day, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-20;
- (c) ~~One (1) surface coating spray booth, identified as AXPB, constructed in March 2000, utilizing either a HVLP spray application system or a dip tank reservoir with cover, identified as AXDT, constructed in 2000, coating a maximum of 12 metal axles per hour, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as S-28;~~

...

The following insignificant activities, as defined in 326 IAC 2-7-1(21):

- ~~(s)~~(q) One (1) Vacuum Process Impregnation (VPI) system, to be installed during November 2006, including a vacuum chamber with a capacity of six (6) locomotive motor armatures, ~~and an insulating varnish storage tank containing about 1,200 gallons varnish, and a wipe cleaning operation which uses a maximum of 0.38 gallon of solvent per day,~~ processing up to twelve (12) armatures per day, and exhausting fugitively inside the building during rack removal from the vacuum chamber, **through stack S-50 at the end of each impregnation cycle,** and through oven A425 stacks S-38 and S-40 during drying/baking. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]
- ~~(t)~~(r) One (1) electrochemical nickel electroplating process, to be installed during 2007, using brush pad applicators, processing up to two and one-half (2.5) axles per hour using a current of approximately 40 ampere-hour to plate each axle. The process also includes one (1) 0.195 MMBtu per hour natural gas fired water evaporator exhausting at stack S-41; and solvent wipe cleaning and brush application of rust protection to plated axles at about 0.04 gallons per 2.5 axles. [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

(s) **Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:**

(1) **One (1) surface coating spray booth, identified as TD101, approved for construction in 2007, utilizing an HVLP spray application system, using dry filters for particulate matter control, and exhausting to stack S-28. [326 IAC 6.8-1-2] [326 IAC 2-3]**

(2) **One (1) paint booth for service/repair operation, identified as TOPB, approved for construction in 2007, controlled by a dry filter, and exhausting to stack S-43. [326 IAC 6.8-1-2] [326 IAC 2-3]**

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

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

- (a) 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 ~~four (4)~~ **three (3)** surface coating spray booths (1213, 1221, AXPB and BPB-1) **and dip tank AXDT** shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

...

D.1.2 Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

- (a) The total usage of VOCs, including coatings, dilution solvents, and cleaning solvents, input to the source surface coating **operations in Section D.1** and degreasing operations **in Section D.2**, ~~including the VPI system and axle plating operation (Sections D.1 and D.2, respectively)~~, shall be limited to less than 24.51 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This usage limit is required to limit the ~~source potential to emit of VOC emissions from the entire source~~, including insignificant **combustion** activities, to less than 25 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable. Compliance with the limit shall also satisfy the requirements of 326 IAC 2-8 and make 326 IAC 2-7 (Part 70) not applicable.

...

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

~~Pursuant to 325 IAC 6-3-2(d), particulate from the four (4) surface coating spray booths (1213, 1221, and BPB-1) shall be controlled by a dry filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

D.1.3 PM Emission Limits [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from each of the paint booths 1213, 1221, BPB-1, TD101, and TOPB shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).

...

D.1.6 Monitoring

- (a) Once per shift inspections shall be performed to verify the placement, integrity and particle loading of the filters and plenums. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the ~~four (4)~~ **three (3)** surface coating spray booth stacks, S-21, S-20, ~~S-28~~ and S-1, while one or more of the booths are in operation. ~~If inclement weather prevents safe access to the rooftop for an entire week, then the Permittee is excused from the requirement to perform the observation of overspray from stack S-28 for that week.~~ The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

...

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below for **all the surface coating operations listed in Section D.1** ~~spray booths 1213, 1221, AXPB and BPB-1.~~ Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the respective VOC emission and usage limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

...

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, once per shift filter/plenum and quarterly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan. ~~If overspray observations of stack S-28 were not performed for any week due to inclement weather, the Permittee shall make a record of the type(s) of inclement weather and an explanation of why the inclement weather made rooftop access unsafe for purposes of observing the stack.~~

...

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

...

- (f) **One (1) degreaser for truck service/repair operation, identified as 865A, approved for construction in 2007, using an organic cleaning solvent, with a maximum capacity of 260 gallons;**
- (f)(g) Cold cleaner degreasing operations using heated non-organic cleaners, including an alkaline solution or hot water, consisting of ~~the following:~~
- (1) ~~Seven (7) five (5) units constructed in 1988, identified as 059 (stack ID # S-31), 750 (stack ID # S-7), 982 (stack ID # S-10), 1103 (stack ID # S-36), 1218 (stack ID # S-22), and 1219 (stack ID # S-19), 4263 (stack ID # S-12); and;~~
- (2) ~~One (1) unit constructed in 2002, identified as identified as FAW (stack ID # 35).~~
- (h) **One (1) aqueous washer, identified as FAW, approved for construction in 2007, using up to 3% of defoamer, and exhausting inside the building;**

~~(g)(i)~~ **One (1) C**onveyorized degreasing operations using a heated non-organic alkaline solution, ~~consisting of two (2) units identified as 765, constructed in 1988 (stack ID # S-3), and SMPT, constructed in 2000 (stack ID # S-26);~~

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

D.2.1 Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-7]

- (a) The total usage of VOCs, including coatings, dilution solvents, and cleaning solvents, input to the source surface coating **operations in Section D.1** and degreasing operations **in Section 2 (Sections D.1 and D.2, respectively)**, shall be limited to less than 24.51 tons per 12 consecutive month period with compliance demonstrated at the end of each month. This usage limit is required to limit the ~~source potential to emit of~~ **VOC emissions from the entire source**, including insignificant **combustion** activities, to less than 25 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable. Compliance with the limit shall also satisfy the requirements of 326 IAC 2-8 and make 326 IAC 2-7 (Part 70) not applicable.

...

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for each of the cold cleaner degreasing units MPW-1 ~~and SML-1, and 865A~~, the Permittee shall:

...

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for each of the cold cleaner degreaser operations MPW-1 ~~and SML-1, and 865A~~, the Permittee shall ensure that the following control equipment requirements are met:

...

D.2.4 Volatile Organic Compounds [326 IAC 8-3-2] [326 IAC 8-3-5] [326 IAC 8-3-4] [326 IAC 8-3-7]

- (a) The Permittee shall not use organic solvents in the ~~eight (8)~~ **five (5)** cold cleaner degreasing units identified as ~~059, 750, 982, 1103, 1218, 1219, 4263, FAW;~~ and the ~~two (2)~~ **one (1)** conveyorized degreasing units identified as 765 ~~and SMPT~~.
- (b) **The actual VOC emissions from aqueous washer FAW, which uses defoamer, shall be less than 15 lbs/day.**
- (c) **The actual VOC emissions from the aqueous degreasing operation SML-1 shall be less than 15 lbs/day.**

Compliance with this condition shall make the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations), 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), 326 IAC 8-3-4 (Conveyorized Degreaser Operation) and 326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control) not applicable to ~~these eight (8) degreasing the units listed in this condition~~. Any change or modification which may alter this determination shall require prior approval from the Office of Air Quality (OAQ) before such change can occur.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8(c)(2) (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate the cold cleaner degreaser units MPW-1 ~~and SML-1, and 865A~~ with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.6 Record Keeping Requirements [326 IAC 8-3-8]

- (a) Pursuant to 326 IAC 8-3-8(d)(2), the Permittee shall maintain each of the following records relating to each purchase of solvent used at the cold cleaner degreasers MPW-1

and ~~SML-1~~ **865A**:

...

D.2.7 Record Keeping and Reporting Requirements [326 IAC 8-7]

- (a) Pursuant to 326 IAC 8-7-6, the Permittee shall submit the following certification for the cold cleaner degreasers identified as MPW-1 and ~~SML-1~~ and **865A**:

...

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below for **the degreasing units listed in Section D.2 which use VOC containing solvents or cleaning solutions MPW-1 and SML-1.** Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

...

- (b) **To document compliance with Conditions D.2.4(b) and D.2.4(c), the Permittee shall maintain daily records in accordance with (1) through (3) below for washer FAW and degreasing operation SML-1 when VOC containing solutions are used in these units. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limit established in Conditions D.2.4(b) and D.2.4(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**

(1) **The VOC content of the defoamer or organic solvent used.**

(2) **The amount of the defoamer or organic solvent used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

(3) **The total VOC emissions per day.**

- ~~(b)(c)~~ (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

...

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- ~~(h)~~(j) One (1) mechanical blasting unit, identified as 617, constructed in 2006, with a maximum capacity of 8000 pounds of steel parts per hour, utilizing one (1) baghouse for particulate matter control, and exhausting to stack S-9;

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

~~D.3.1~~ Particulate [326 IAC 6-3-2]

~~Pursuant to 326 IAC 6-3-2, (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following facilities shall not exceed the limits as stated when operating at the respective process weight rates:~~

Emission Unit	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
Mechanical Blaster (617)	4.0	40.37

The pounds per hour limitation was calculated with the following equation:

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

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

...

D.3.1 PM Emission Limits [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from the blasting unit 617 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.3.2 Particulate (PM) and PM10 [326 IAC 2-8][326 IAC 2-3][326 IAC 6.8-1-1(a)(2)]

The PM and PM10 emitted from the following processes shall be limited as follows:

Emission Unit	Allowable PM Emission Rate (lb/hr)	Allowable PM10 Emission Rate (lb/hr)
Mechanical Blaster (617)	9.15	9.15

These limits are required to limit the potential to emit of PM and PM10 of the source, including other significant and insignificant activities, to less than 100 tons per twelve (12) consecutive month period. Compliance with these limits shall make the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-3 (Emission Offset) not applicable, and the requirements of 326 IAC 6.8 (Particulate Matter Limitations for Lake County) not applicable for emissions of PM.

...

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]
- ...
- (3) One (1) air arc steel cutting station, identified as AAB (stack ID # S-32 and S-33), with an electrode consumption rate of 0.26 pounds per hour.
- (4) Three (3) MIG welding stations, approved for construction in 2007, each with a maximum consumption of 0.075 pounds of wire per hour.
- (5) One (1) air arc cutting operation, identified as AAB, approved for construction in 2007, exhausting through stacks S-32 and S-33.
- (s) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:
- (3) One (1) thermal spray gun, identified as TSPG, approved for construction in 2007, controlled by cyclone TSCY and cartridge filter TSC, and exhausting to stack S-42. [326 IAC 6.8-1-2]

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

~~D.4.1 Particulate [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the welding and cutting operations, which have a process weight rate less than 100 pounds per hour, shall be limited to 0.551 pounds per hour each.~~

~~D.4.1 PM Emission Limits [326 IAC 6.8-1-2]~~

~~Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from each of welding and cutting stations and thermal spray gun TSPG shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).~~

~~Compliance Determination Requirements~~

~~There are no specific compliance determination requirements applicable to these facilities.~~

~~Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]~~

~~There are no specific compliance monitoring requirements applicable to these facilities.~~

SECTION D.5 FACILITY OPERATION CONDITIONS – Blasting Units 117, TSB, 1255, and TOBB

Facility Description [326 IAC 2-8-4(10)]

- (k) One (1) bead blast booth, identified as Unit 117, approved for construction in 2007, with a maximum blast rate of 500 pounds of glass beads per hour, controlled by a baghouse, and exhausting inside the building;
- (l) One (1) grit blast gun for thermal spray operation, identified as TSB, approved for construction in 2007, with a maximum blast rate of 450 pounds of black beauty per hour, controlled by a baghouse (identified as TSBC), and exhausting inside the building;
- (m) One (1) rotoblaster for truck service/repair operation, identified as Unit 1255, approved for construction in 2007, controlled by a baghouse, and exhausting to stack S-44; and
- (n) One (1) grit blast booth for truck service/repair operation, identified as TOBB, approved for construction in 2007, with a maximum blast rate of 750 pounds of black beauty per hour, controlled by baghouse, and exhausting to stack S-45.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 PM/PM10 Emission Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following PM/PM10 emission limits for blasting units 117, TSB, 1255, and TOBB:

Unit ID	Unit Description	PM/PM10 Emission Limits (lbs/hr)
117	Bead Blast Booth	0.04
TSB	Grit Blasting Unit	0.04
1255	Rotoblaster Unit	0.04
TOBB	Grit Blasting Unit	0.06

Compliance with these limits, combined with the PM/PM10 emissions from all other units at this source, shall limit the source-wide potential to emit PM and PM10 to less 250 tons and 100 tons per year, respectively, and render the requirements of 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-2 (PSD), and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.5.2 Minor Permit Revision Limits [326 IAC 2-8-11.1(d)]

Pursuant to 326 IAC 2-8-11.1(d)(5)(C) (Minor Permit Revision), the Permittee shall comply with the following for the baghouses associated with blasting units 117, TSB, 1255, and TOBB:

- (a) Achieving and maintaining 99% efficiency.
- (b) No visible emissions.

Compliance with these requirements shall render the requirements of 326 IAC 2-8-11.1(f) (Significant Permit Revision) not applicable.

D.5.3 PM Emission Limits [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), PM emissions from each of the blasting units 117, TSB, 1255, and TOBB shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths

(0.03) grain per dry standard cubic foot (dscf).

D.5.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.5.5 Particulate Control

- (a) In order to comply with Conditions D.5.1 through D.5.3, each of the blasting units 117, TSB, 1255, and TOBB shall be controlled by the associated baghouse when the unit is in operation.**
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.6 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts from baghouse stack exhausts from blasting units 1255 and TOBB shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are visible.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) If any visible emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.**

D.5.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with blasting units 117, TSB, 1255, and TOBB, at least once per day when these units are in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal ranges listed in the table below or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

Emission Unit ID	Pressure Drop Range (inches of water)	Emission Point
117	0.5 - 6.5	Inside the building
TSB	0.5 - 6.5	Inside the building
1255	0.5 - 6.5	Stack S-44
TOBB	0.5 - 6.5	Stack S-45

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.5.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.9 Record Keeping Requirements

- (a) To document compliance with Condition D.5.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) 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 DATA SECTION

FESOP Quarterly Report

Source Name: Progress Rail Services Corporation
Source Address: 175 West Chicago Avenue, East Chicago, IN 46312
Mailing Address: P.O. Box 1037, Albertville, AL 35950
FESOP No.: F089-9922-00381
Facility: ~~four (4) surface~~ **Surface** coating spray booths operations (1213, 1221, ~~AXPB~~ **AXDT**, and ~~BPB-1, TD101, and TOPB~~), VPI system, axle plating operation, and ~~two (2) cold cleaner degreasers~~ **degreasing operations** (MPW-1 and SML-1, **865A, and FAW**)
Parameter: VOC usage
Limit: ~~The total usage of VOCs, including coatings, dilution solvents, and cleaning solvents, input to the source surface coating and degreasing operations, including the VPI system and axle plating operation (Sections D.1 and D.2, respectively), shall be limited to less~~ **Less** than 24.51 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	VOC Usage this Month	VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

- No deviation occurred in this ~~month~~ **quarter**.
 Deviation/s occurred in this ~~month~~ **quarter**.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No. 089-24989-00381. The staff recommend to the Commissioner that this FESOP Minor Permit Revision be approved.

**Appendix A: Emission Calculations
VOC and HAP Emissions
From Washer FAW**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Unit	Solvent	Density (lbs/gal)	Weight % VOC	Maximum Usage (gal/month)	PTE of VOC (tons/yr)
FAW	Cleaning Solution	8.34	0%	200	0.00
FAW	defoamer	8.34	10%	12.6	0.06
Total					0.06

Note: The cleaning solution and defoamer used at this washer do not contain any HAP.

METHODOLOGY

PTE of VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Max. Usage (gal/month) x 12 month/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions
From the New Wipe Cleaning Operation Associated with the VPI Process

Company Name: Progress Rail Services Corporation

Address: 175 West Chicago Ave., East Chicago, IN 46312

MPR: 089-24989-00381

Reviewer: ERG/YC

Date: September 19, 2007

1. PTE of VOC:

Solvent	VOC Content (lbs/gal)	Maximum Usage (gal/day)	PTE of VOC (tons/yr)
Sunnyside 457 Lacquer Thinner	5.02	0.38	0.34

Note: No PM/PM10 emissions are emitted from this wipe cleaning operation.

METHODOLOGY

PTE of VOC (tons/yr) = VOC Content (lbs/gal) x Max. Usage (gal/day) x 365 days/yr x 1 ton/2000 lbs

2. PTE of HAP:

Solvent	Density (lbs/gal)	Maximum Usage (gal/day)	Weight % of Methanol	PTE of Methanol (tons/yr)	Weight % of Toluene	PTE of Toluene (tons/yr)	Weight % of Glycol Ether	PTE of Glycol Ether (tons/yr)
Sunnyside 457 Lacquer Thinner	7.28	0.38	7.74%	0.04	17.7%	0.09	3.00%	1.49E-02

Total HAPs = 0.14 tons/yr

METHODOLOGY

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Usage (gal/day) x Weight % of HAP x 365 days/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC, PM/PM10, and HAP Emissions
From Paint Booth TD101**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

1. PTE of PM/PM10 and VOC

Material	VOC Content (lbs/gal)	Max. Throughput (units/day)	Max. Usage (gal/unit)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Coating Solid Content (lbs/gal)	Transfer Efficiency*	PTE of PM/PM10 before Control (tons/yr)
5216 Heat Resistant Aluminum EN	3.35	23	0.04	2.71	0.49	1.67	60%	0.10
Black Paint	1.84	3	0.30	1.66	0.30	2.44	60%	0.16
Total					0.80			0.26

* HVLP application method is used in this booth. The transfer efficiency is provided by the source and is lower than the number listed in AP-40.

METHODOLOGY

PTE of VOC (lbs/day) = VOC Content (lbs/gal) x Max. Throughput (units/day) x Max. Usage (gal/unit)

PTE of VOC (tons/yr) = PTE of VOC (lbs/day) x 365 days/yr x 1 ton/2000 lbs

PTE of PM/PM10 before Control (tons/yr) = Coating Solid Content (lbs/gal) x Max. Throughput (units/day) x Max. Usage (gal/unit) x 365 days/yr x 1 ton/2000 lbs :
(1-Transfer Efficiency)

2. PTE of HAP

Material	Max. Throughput (units/day)	Max. Usage (gal/unit)	Toluene Content (lbs/gal)	PTE of Toluene (tons/yr)	Xylene Content (lbs/gal)	PTE of Xylene (tons/yr)	Ethyl Benzene Content (lbs/gal)	PTE of Ethyl Benzene (tons/yr)	Glycol Ether Content (lbs/gal)	PTE of Glycol Ethers (tons/yr)
5216 Heat Resistant Aluminum EN	23	0.04	0.51	0.08	1.16	0.17	0.29	0.04	0.00	0.00
Black Paint	3	0.30	0.00	0.00	0.00	0.00	0.00	0.00	1.29	0.21
Total				0.08		0.17		0.04		0.21

Total HAPs : 0.50 tons/yr

METHODOLOGY

PTE of HAP (tons/yr) = Max. Throughput (units/day) x Max. Usage (gal/unit) x HAP Content (lbs/gal) x 365 days/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
PM and PM10 Emissions
From Bead Blast Booth Unit 117**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Blast Media: Glass Beads

Unit ID	Max. Abrasive Usage (lbs/hr)	PM Emission Factor (lbs/lbs)	PTE of PM before Control (lbs/hr)	PTE of PM before Control (tons/yr)	PM10 Emission Factor (lbs/lbs PM)	PTE of PM10 before Control (lbs/hr)	PTE of PM10 before Control (tons/yr)	Control Device	Control Efficiency	PTE of PM after Control (lbs/hr)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (lbs/hr)	PTE of PM10 after Control (tons/yr)
Unit 117	500	0.010	5.00	21.9	0.70	3.50	15.3	baghouse	99.0%	5.00E-02	0.22	3.50E-02	0.15

* The emission factors are from grit blasting from Air Quality Permits, Vol.1, Section 3 "Abrasive Blasting" (1991 Edition) by Stappa Alapco.

Methodology

PTE of PM before Control (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs)

PTE of PM before Control (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM10 before Control = Potential PM Emissions x PM10 Emission Factor

PTE of PM/PM10 after Control = PTE of PM/PM10 before Control x (1 - Control Efficiency)

**Appendix A: Emission Calculations
PM and PM10 Emissions
From Grit Blasting Gun TSB**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Blast Media: Black Beauty

Unit ID	Max. Abrasive Usage (lbs/hr)	PM Emission Factor (lbs/lbs)	PTE of PM before Control (lbs/hr)	PTE of PM before Control (tons/yr)	PM10 Emission Factor (lbs/lbs PM)	PTE of PM10 before Control (lbs/hr)	PTE of PM10 before Control (tons/yr)	Control Device	Control Efficiency	PTE of PM after Control (lbs/hr)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (lbs/hr)	PTE of PM10 after Control (tons/yr)
TSB	450	0.010	4.50	19.7	0.70	3.15	13.8	Dust Collector	99.0%	4.50E-02	0.20	3.15E-02	0.14

* The emission factors are from grit blasting from Air Quality Permits, Vol.1, Section 3 "Abrasive Blasting" (1991 Edition) by Stappa Alapco.

Methodology

PTE of PM before Control (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs)

PTE of PM before Control (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM10 before Control = Potential PM Emissions x PM10 Emission Factor

PTE of PM/PM10 after Control = PTE of PM/PM10 before Control x (1 - Control Efficiency)

**Appendix A: Emission Calculations
VOC, PM/PM10, and HAP Emissions
From Spraying Gun TSPG**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

1. PTE of PM/PM10

This unit sprays stainless steel plating on axles and is a new coating technology. There are no VOC emissions from this coating operation.

Material	Max. Usage (lbs/unit)	Max. Throughput (units/day)	Transfer Efficiency*	PTE of PM/PM10 before Control (tons/yr)
Stainless Steel Electrode	0.2143	21	70%	0.25

* This information was provided by the source based on actual operating data for a similar unit.

METHODOLOGY

PTE of PM/PM10 before Control (tons/yr) = Max. Usage (lbs/unit) x Max. Throughput (units/day) x 365 days/yr x 1 ton/2000 lbs x (1-Transfer Efficiency)

2. PTE of HAP

HAP Content: 35% (for chromium)

PTE of HAP (tons/yr) = 0.25 tons/yr of PM/PM10 x 35% = **0.09 tons/yr (uncontrolled)**

**Appendix A: Emission Calculations
VOC, PM/PM10, and HAP Emissions
From Paint Booth TOPB**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

1. PTE of VOC and PM/PM10:

Material	VOC Content (lbs/gal)	Max. Throughput (units/hr)	Max. Usage (gal/unit)	PTE of VOC (tons/yr)	Coating Solid Content (lbs/gal)	Transfer Efficiency*	PTE of PM/PM10 before Control (tons/yr)
Coating	3.48	0.075	1.25	1.43	5.80	55%	1.07
Thinner	6.52	0.075	7.81E-03	0.02	0.00	55%	0.00
Cleaning - Xylol	7.25	0.075	0.10	0.24	0.00	55%	0.00
Cleaning - Sunnyside Thinner	6.52	0.075	0.40	0.86	0.00	55%	0.00
Total				2.54			1.07

* HVLP application method is used in this booth. The transfer efficiency is provided by the source and is lower than the number listed in AP-40.

METHODOLOGY

PTE of VOC (tons/yr) = VOC Content (lbs/gal) x Max. Throughput (units/hr) x Max. Usage (gal/unit) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 before Control (tons/yr) = Coating Solid Content (lbs/gal) x Max. Throughput (units/hr) x Max. Usage (gal/unit) x 8760 hrs/yr x 1 ton/2000 lbs x (1-Transfer Efficiency)

2. PTE of HAPs:

Material	Density (lbs/gal)	Max. Throughput (units/hr)	Max. Usage (gal/unit)	Weight % of Toluene	PTE of Toluene (tons/yr)	Weight % of Xylene	PTE of Xylene (tons/yr)	Weight % of Ethyl Benzene	PTE of Ethyl Benzene (tons/yr)
Coating	9.28	0.075	1.25	2.93%	0.11	-	-	-	-
Thinner	6.52	0.075	7.81E-03	-	-	-	-	-	-
Cleaning - Xylol	7.25	0.075	0.10	-	-	80.0%	0.19	20.0%	0.05
Cleaning - Sunnyside Thinner	6.52	0.075	0.40	-	-	-	-	-	-
Total					0.11		0.19		0.05

Total HAPs =

0.35 tons/yr

METHODOLOGY

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Throughput (units/hr) x Max. Usage (gal/unit) x Weight % of HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
PM and PM10 Emissions
From Rotoblaster Unit 1255**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Blast Type: Steel Shot

This rotoblaster unit is not a typical blasting unit. This is a tumbling system which has lower emissions.

Unit ID	Uncontrolled PM/PM10 Emission Rate* (lbs/hr)	PTE of PM/PM10 before Control (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 after Control (lbs/hr)	PTE of PM/PM10 after Control (tons/yr)
Unit 1255	4.00	17.5	99.0%	0.04	0.18
Total		17.5			0.18

* This information was provided by the source based on the actual uncontrolled emissions measured at a similar unit.

Methodology

PTE of PM/PM10 before Control (tons/yr) = Uncontrolled PM/PM10 Emission Rate (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 after Control (lbs/hr) = Uncontrolled PM/PM10 Emission Rate (lbs/hr) x (1-Control Efficiency)

PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM before Control (tons/yr) x (1-Control Efficiency)

**Appendix A: Emission Calculations
VOC Emissions
From Solvent Degreaser Unit 865A**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Unit	Density (lbs/gal)	Weight % VOC	Max. Throughput (units/hr)	Maximum Usage (gal/unit)	PTE of VOC (tons/yr)
865A	6.80	100%	0.075	0.35	0.78
Total					0.78

Note: The solvent used in this degreaser does not contain any federally regulated HAP.

METHODOLOGY

PTE of VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Max. Throughput (units/hr) x Max. Usage (gal/unit) x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
PM and PM10 Emissions
From Grit Blasting Unit TOBB**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Blast Media: Black Beauty

Unit ID	Max. Abrasive Usage (lbs/hr)	PM Emission Factor (lbs/lbs)	PTE of PM before Control (lbs/hr)	PTE of PM before Control (tons/yr)	PM10 Emission Factor (lbs/lbs PM)	PTE of PM10 before Control (lbs/hr)	PTE of PM10 before Control (tons/yr)	Control Device	Control Efficiency	PTE of PM after Control (lbs/hr)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (lbs/hr)	PTE of PM10 after Control (tons/yr)
TOBB	750	0.010	7.50	32.9	0.70	5.25	23.0	Dust Collector	99.0%	7.50E-02	0.33	5.25E-02	0.23

* The emission factors are from grit blasting from Air Quality Permits, Vol.1, Section 3 "Abrasive Blasting" (1991 Edition) by Stappa Alapco.

Methodology

PTE of PM before Control (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs)

PTE of PM before Control (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM10 before Control = Potential PM Emissions x PM10 Emission Factor

PTE of PM/PM10 after Control = PTE of PM/PM10 before Control x (1 - Control Efficiency)

Appendix A: Emission Calculations

PM and HAP Emissions From Welding/Cutting Equipment

Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)	
			PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Metal Inert Gas (MIG)(carbon steel)	3	0.075					0.0055	0.0005				1.13E-04

PROCESS	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 (lbs/hr)				
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr					
FLAME CUTTING																
Air Arc Cutting	1	0.5	2					0.1622	0.0005	0.0001	0.0003	0.010	3.00E-05	6.00E-06	1.80E-05	5.40E-05

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential to Emit (lbs/hr)	0.01	1.43E-04	6.00E-06	1.80E-05	1.67E-04
Potential to Emit (lbs/day)	0.26	3.42E-03	1.44E-04	4.32E-04	4.00E-03
Potential to Emit (tons/year)	0.05	6.24E-04	2.63E-05	7.88E-05	7.29E-04

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

METHODOLOGY

Welding emissions (lb/hr) = (# of stations) x Max. electrode consumption (lbs/hr/station) x Emission Factor (lb pollutant/lb of electrode used)

Cutting emissions (lb/hr) = (# of stations) x Max. Metal Thickness (in) x Max. Cutting Rate (in./min) x 60 min/hr x Emission Factor (lb pollutant/1,000 in. cut, 1" thick)

PTE (lbs/day) = emissions (lbs/hr) x 24 hrs/day

PTE (tons/yr) = emissions (lb/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From the NG Fired Heaters with the Aqueous Washers Units 1239 and 1292**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Heat Input Capacity
MMBtu/hr

4.10

(3 units total)

Potential Throughput
MMSCF/yr

35.2

	Pollutant					
	PM	PM10*	SO ₂	**NO _x	VOC	CO
Emission Factor in lbs/MMSCF	1.9	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	0.03	0.13	1.1E-02	1.76	0.10	1.48

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

**Emission factor for NO_x: Uncontrolled = 100 lbs/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 07/98)

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMSCF = 1,000,000 Standard Cubic Feet of Gas

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lbs/MMSCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions
From the Natural Gas-Fired Units**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

Heat Input Capacity
MMBtu/hr

4.10

(3 units total)

Potential Throughput
MMSCF/yr

35

Emission Factor in lbs/MMSCF	Pollutant					Total HAPs 1.89
	Hexane 1.8E+00	Formaldehyde 7.5E-02	Toluene 3.4E-03	Benzene 2.1E-03	Nickel 2.1E-03	
Potential to Emit in tons/yr	0.03	1.32E-03	5.99E-05	3.70E-05	3.70E-05	0.03

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-3 and 1.4-4 (AP-42, 07/98).

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMSCF = 1,000,000 Standard Cubic Feet of Gas

Methodology

Potential Throughput (MMSCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu

PTE (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lbs/MMSCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Potential to Emit Summary**

**Company Name: Progress Rail Services Corporation
Address: 175 West Chicago Ave., East Chicago, IN 46312
MPR: 089-24989-00381
Reviewer: ERG/YC
Date: September 19, 2007**

1. Unlimited PTE of this Revision

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Washer FAW	-	-	-	-	0.06	-	-
Wipe Cleaning Associated with VPI	-	-	-	-	0.34	-	0.14
Paint Booth TD101	0.26	0.26	-	-	0.80	-	0.50
Blast Booth Unit 117	21.9	15.3	-	-	-	-	-
Blast Booth Unit TSB	19.7	13.8	-	-	-	-	-
Spray Gun TSPG	0.25	0.25	-	-	-	-	0.09
Paint Booth TOPB	1.07	1.07	-	-	2.54	-	0.35
Rotoblaster Unit 1255	17.5	17.5	-	-	-	-	-
Degreaser Unit 865A	-	-	-	-	0.78	-	-
Blast Booth TOBB	32.9	23.0	-	-	-	-	-
Welding/Cutting Equipment	0.05	0.05	-	-	-	-	7.29E-04
Washers Units 1239 and 1292	0.03	0.13	0.01	1.76	0.10	1.48	0.03
Total PTE	93.6	71.4	0.01	1.76	4.62	1.48	1.11

2. Limited PTE of this Revision (The Permittee is required to control all the blasting units with baghouses.)

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Washer FAW	-	-	-	-	0.06	-	-
Wipe Cleaning Associated with VPI	-	-	-	-	0.34	-	0.14
Paint Booth TD101	0.26	0.26	-	-	0.80	-	0.50
Blast Booth Unit 117	0.22	0.15	-	-	-	-	-
Blast Booth Unit TSB	0.20	0.14	-	-	-	-	-
Spray Gun TSPG	0.25	0.25	-	-	-	-	0.09
Paint Booth TOPB	1.07	1.07	-	-	2.54	-	0.35
Rotoblaster Unit 1255	0.18	0.18	-	-	-	-	-
Degreaser Unit 865A	-	-	-	-	0.78	-	-
Blast Booth TOBB	0.33	0.23	-	-	-	-	-
Welding/Cutting Equipment	0.05	0.05	-	-	-	-	7.29E-04
Washers Units 1239 and 1292	0.03	0.13	0.01	1.76	0.10	1.48	0.03
Total PTE	2.58	2.46	0.01	1.76	4.62	1.48	1.11