



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 11, 2009

RE: National Railroad Passenger Corp. / 097 - 25151 - 00014

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**National Railroad Passenger Corporation
202 Garstang Street
Beech Grove, Indiana 46107**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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.

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.

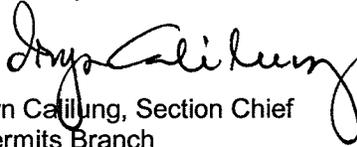
| | |
|---|--|
| Operation Permit No.: F097-25151-00014 | |
| Issued by:  Iryn Callung, Section Chief Permits Branch Office of Air Quality | Issuance Date: June 11, 2009 Expiration Date: June 11, 2019 |

TABLE OF CONTENTS

| | |
|---|-----------|
| A. SOURCE SUMMARY..... | 4 |
| A.1 General Information [326 IAC 2-8-3(b)] | |
| A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)] | |
| A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)] | |
| A.4 FESOP Applicability [326 IAC 2-8-2] | |
| B. GENERAL CONDITIONS | 6 |
| B.1 Definitions [326 IAC 2-8-1] | |
| B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)] | |
| B.3 Term of Conditions [326 IAC 2-1.1-9.5] | |
| B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12] | |
| B.5 Severability [326 IAC 2-8-4(4)] | |
| B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)] | |
| B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)] | |
| B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)] | |
| B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)] | |
| B.10 Compliance Order Issuance [326 IAC 2-8-5(b)] | |
| B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] | |
| B.12 Emergency Provisions [326 IAC 2-8-12] | |
| B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] | |
| B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)] | |
| B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)] | |
| B.16 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] | |
| B.17 Permit Renewal [326 IAC 2-8-3(h)] | |
| B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1] | |
| B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1] | |
| B.20 Source Modification Requirement [326 IAC 2-8-11.1] | |
| B.21 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] | |
| B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10] | |
| B.23 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] | |
| B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9] | |
| B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6] | |
| C. SOURCE OPERATION CONDITIONS | 16 |
| Emission 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] | |
| C.2 Overall Source Limit [326 IAC 2-8] | |
| C.3 Opacity [326 IAC 5-1] | |
| C.4 Open Burning [326 IAC 4-1] [IC 13-17-9] | |
| C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2] | |
| C.6 Fugitive Dust Emissions [326 IAC 6-4] | |
| C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] | |
| Testing Requirements [326 IAC 2-8-4(3)] | |
| C.8 Performance Testing [326 IAC 3-6] | |

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23

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

D.1.1 HAP FESOP Limits [326 IAC 2-8-4]

D.1.1 VOC FESOP Limits [326 IAC 2-8-4]

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.1.4 Particulate Emissions [326 IAC 6-3-2(d)]

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

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

D.1.6 Monitoring

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

D.1.7 Record Keeping Requirement

D.1.8 Reporting Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 28

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.2.4 Particulate Matter

| | |
|---|----|
| Certification Form | 28 |
| Emergency Occurrence Form | 29 |
| FESOP Usage Report Form | 31 |
| Quarterly Report Form | 37 |
| Quarterly Deviation and Compliance Monitoring Report Form | 38 |

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 rail car repair, trim, painting and reconditioning of locomotives and passenger cars.

| | |
|------------------------------|--|
| Source Address: | 202 Garstang Street, Beech Grove, Indiana 46107 |
| Mailing Address: | 202 Garstang Street, Beech Grove, IN 46107 |
| General Source Phone Number: | (317) 263-0400 |
| SIC Code: | 4011 |
| County Location: | Marion |
| Source Location Status: | Nonattainment for PM2.5 standard Attainment for all other criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

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

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

- (a) One (1) Paint booth identified as emission unit EU-069, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-069. This paint booth is located in the Diesel Shop Building.
- (b) One (1) Paint booth (small room) identified as EU-070A, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to two (2) stacks S-070A1 and S-070A2. This paint booth is located in the Trim Shop Building.
- (c) One (1) Paint room identified as EU-070B, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to ten (10) stacks S-070B1 through S-070B10. This paint booth is located in the Trim Shop Building.
- (d) One (1) Paint booth identified as EU-071, constructed in May 2000, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-071. This paint booth is located in the Trim Shop Building.
- (e) One (1) Paint booth identified as EU-072, constructed in January 1994, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-072. This paint booth is located in the Truck and Forge Shop Building.
- (f) One (1) diesel powered transfer table, identified as DTT-01, constructed in 1978, equipped with a Caterpillar diesel engine and exhausting to a steel, eight (8) feet vertical

exhaust stack measuring four (4) inches in diameter, SDTT-01. This transfer table is located between the Trim Shop and Coach Shop Buildings.

- (g) Two (2) natural gas-fired Heat Treat Furnaces (HT-01 and HT-02), each 7.0 MMBtu/hr heat input, constructed in 1993, each exhausting to stacks SHT-01 and SHT-02, respectively. [326 IAC 6-2-4]

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:

- (a) Combustion related activities including space heaters, process heaters, heat treat furnaces, and boilers whose potential uncontrolled emission meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1). A specific rule applies to the two (2) natural gas-fired boilers (B-01 and B-02), each 2.1 MMBtu/hr heat input, constructed in 1993, each exhausting to stacks SB-01 and SB-02, respectively. [326 IAC 6-2-4]
- (b) A self-enclosed Grit Blaster System (EU-GBCF), constructed in 1985, that utilizes a reclaiming (cyclone separator) for grit (raw material) reuse and a dust collector or baghouse (CE-01) utilized as control equipment for particulate matter, complete with Donaldson Torit Ultraweb high efficiency nanofiber cartridge filters. The reclaiming and the associated equipment are considered integral to the process; with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, and exhausting to stack SGB-01. [326 IAC 6-3-2]
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (h) Paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (i) Activities performed using hand held equipment including surface grinding and machining metal operations.
- (j) Welding operations with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM-10) for each welding activity of less than five (5) pounds per hour or twenty-five (25) pounds per day.

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) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 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.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F097-25151-00014, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [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.6 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.7 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [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.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement 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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 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.11 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 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 describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement
Branch)
Facsimile Number: 317-233-6865

- (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 and Enforcement 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 an "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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F097-25151-00014 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 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.15 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 Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "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.16 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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "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.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 being needed to process the application.

B.18 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee 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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, 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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 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.22 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement 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.23 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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 any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) 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
- (3) 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) Pursuant to 326 IAC 2-2 (PSD), 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.

(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 that 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed 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.8 Performance Testing [326 IAC 3-6]

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 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 or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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 the inability to meet this date.

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

C.15 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 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 or ninety (90) days of initial start-up, whichever is later.

C.17 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 an "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 and Enforcement 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Paint booth identified as emission unit EU-069, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-069. This paint booth is located in the Diesel Shop Building.
- (b) One (1) Paint booth (small room) identified as EU-070A, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to two (2) stacks S-070A1 and S-070A2. This paint booth is located in the Trim Shop Building.
- (c) One (1) Paint room identified as EU-070B, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to ten (10) stacks S-070B1 through S-070B10. This paint booth is located in the Trim Shop Building.
- (d) One (1) Paint booth identified as EU-071, constructed in May 2000, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-071. This paint booth is located in the Trim Shop Building.
- (e) One (1) Paint booth identified as EU-072, constructed in January 1994, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-072. This paint booth is located in the Truck and Forge Shop Building.

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

D.1.1 HAP FESOP Limits [326 IAC 2-8-4]

- (a) The amount of any single HAP delivered to the paint booths EU-069, EU-070A, EU-071, EU-072 and paint room EU-070B all be limited to less than nine and seven tenths (9.7) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any combination of HAPs delivered to the paint booths EU-069, EU-070A, EU-071, EU-072 and paint room EU-070B shall be less than twenty-one and eight tenths (21.8) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit HAPs from all other emission units at the source, shall limit a single HAP to less than 10 tons per twelve (12) consecutive month period and combination HAPs to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) are not applicable.

D.1.2 VOC FESOP Limits [326 IAC 2-8-4] [326 IAC 8-1-6]

- (a) The VOC delivered to the five (5) paint booths (EU-069, EU-070A, EU-071, and EU-072), paint room EU-070B and VOC emissions from the diesel powered transfer table, shall not exceed ninety-three and five tenths (93.5) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (PSD) not applicable.

- (b) The paint booth EU-071 shall use less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders the provisions of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.
- (c) The paint booth EU-072 shall use less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders the provisions of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.11 - Preventive Maintenance Plan, of this permit, is required for all five (5) paint booths EU-069, EU-070A, EU-070B, EU-071, EU-072 and its emission control devices.

Compliance Determination Requirements

D.1.4 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), Particulate emissions from the paint booths EU-069, EU-070A, EU-070B, EU-071, and EU-072 shall be controlled by a dry particulate filter and subject to the following:

The Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Compliance with the VOC and HAP content 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 and HAP 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) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating (paint) booth stacks (S-069, S-070A1 through S-070A2 (small room), S-070B1 through S-070B10, S-071, and S-072) while one or more of the of the paint guns are in operation. When a condition exists which should result in a response step, the Permittee shall take reasonable response in accordance Section C – Response to Excursions or Exceedances. This section shall be followed whenever a condition exists which should result in a response step(s). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the surface coating area and the presence of overspray on the nearby ground outside of the designated surface coating area. When there is a notable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response in accordance Section C – Response to Excursions or Exceedances. This section shall be followed whenever a condition exists which should result in a response step(s). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 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 (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the HAP and VOC usage limits and/or the HAP and VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The HAP and VOC content of each coating material and solvent used;
 - (2) The amount of coating material and solvent less water used on daily 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 VOC and HAP content of the coatings used for month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP monthly usage;
 - (6) The weight of HAP and VOC emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of daily and monthly inspections of the observations of the overspray from surface coating area while one or more of the paint guns are in operation from any of the paint booths.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with each Conditions D.1.1 and D.1.2 shall be submitted to the addresses 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 require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) diesel powered transfer table, identified as DTT-01, constructed in 1978, equipped with a Caterpillar diesel engine and exhausting to a steel, eight (8) feet vertical exhaust stack measuring four (4) inches in diameter, SDTT-01. This transfer table is located between the Trim Shop and Coach Shop Buildings.

Insignificant Activities

- (a) Combustion related activities including space heaters, process heaters, heat treat furnaces, and boilers whose potential uncontrolled emission meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1). A specific rule applies to the two (2) natural gas-fired boilers (B-01 and B-02), each 2.1 MMBtu/hr heat input, constructed in 1993, each exhausting to stacks SB-01 and SB-02, respectively. [326 IAC 6-2-4]
- (b) A self-enclosed Grit Blaster System (EU-GBCF), constructed in 1985, that utilizes a reclaiming (cyclone separator) for grit (raw material) reuse and a dust collector or baghouse (CE-01) utilized as control equipment for particulate matter, complete with Donaldson Torit Ultraweb high efficiency nanofiber cartridge filters. The reclaiming and the associated equipment are considered integral to the process; with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, and exhausting to stack SGB-01. [326 IAC 6-3-2]

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), Particulate Rules: Emission limitations for facilities specified in 326 IAC 6-2-1(d), the total particulate matter emissions specified in 326 IAC 6-2-1(d) from Boilers B-01 and B-02, (each with 2.1 MMBtu per hour heat input), utilized for indirect heating purposes and constructed after September 21, 1983 (both constructed in 1993), shall be limited to 0.6 pounds per MMBtu heat input, since Q is less than 10 MMBtu/hr.

D.2.2 Particulate Emission Limitations for Manufacturing Processes [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 Grit Blaster System (EU-GBCF) shall not exceed 3.02 pounds per hour when operating at a process weight rate of 1265 pounds per hour.

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

Interpolation of the data for the process weight rate up to 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.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.11 - Preventive Maintenance Plan of this permit, is required for the Grit Blaster System (EU-GBCF), and its emission control device (CE-01).

Compliance Determination Requirements

D.2.4 Particulate Matter

In order to comply with Condition D.2.2 and assure compliance with PM10 emissions, the reclaimer of the Grit Blaster System (EU-GBCF) and dust collector (CE-01), shall be in operation at all times when the EU-GBCF is in operation.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: National Railroad Passenger Corporation
Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
FESOP Permit No.: F097-25151-00014

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 AND ENFORCEMENT 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: National Railroad Passenger Corporation
Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
FESOP Permit No.: F097-25151-00014

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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 AND ENFORCEMENT BRANCH**

FESOP Usage Report
(Submit Report Quarterly)

Source Name: National Railroad Passenger Corporation
Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
FESOP Permit No.: F097-25151-00014
Facility: EU-069, EU-070A, EU-070B, EU-071, and EU-072
Parameter: VOC Emissions
Limit: <93.5 tons per twelve (12) consecutive month period

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| 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 AND ENFORCEMENT BRANCH**

FESOP Usage Report
(Submit Report Quarterly)

Source Name: National Railroad Passenger Corporation
Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
FESOP Permit No.: F097-25151-00014
Facility: EU-071
Parameter: VOC Emissions
Limit: <25 tons per twelve (12) consecutive month period

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| 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 AND ENFORCEMENT BRANCH**

FESOP Usage Report
(Submit Report Quarterly)

Source Name: National Railroad Passenger Corporation
Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
FESOP Permit No.: F097-25151-00014
Facility: EU-072
Parameter: VOC Emissions
Limit: <25 tons per twelve (12) consecutive month period

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: National Railroad Passenger Corporation
 Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
 Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
 FESOP Permit No.: F097-25151-00014
 Facility: EU-069, EU-070A, EU-070B, EU-071, and EU-072
 Parameter: HAP Emissions
 Limit: < 9.7 tons of single HAP per twelve (12) consecutive month period

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: National Railroad Passenger Corporation
Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
FESOP Permit No.: F097-25151-00014
Facility: EU-069, EU-070A, EU-070B, EU-071, and EU-072
Parameter: HAP Emissions
Limit: < 21.8 tons of combination HAPs per twelve (12) consecutive month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| 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 AND ENFORCEMENT BRANCH
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: National Railroad Passenger Corporation
 Source Address: 202 Garstang Street, Beech Grove, Indiana 46107
 Mailing Address: 202 Garstang Street, Beech Grove, IN 46107
 FESOP Permit No.: F097-25151-00014

Months: _____ **to** _____ **Year:** _____

| | |
|--|-------------------------------|
| 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". | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (ATSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

| | |
|----------------------------|--|
| Source Name: | National Railroad Passenger Corporation |
| Source Location: | 202 Garstang Street, Beech Grove, IN 46107 |
| County: | Marion |
| SIC Code: | 4011 |
| Permit Renewal No.: | F097-25151-00014 |
| Permit Reviewer: | Bruce Farrar |

On May 11, 2009, the Office of Air Quality (OAQ) had a notice published in Indianapolis Star and News, Indianapolis, Indiana, stating that National Railroad Passenger Corporation had applied for a Federally Enforceable State Operating Permit Renewal to renew its operating permit. The notice also stated that the OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On May 18, 2009 and May 21, 2009, National Railroad Passenger Corporation submitted comments to IDEM, OAQ on the draft Federally Enforceable State Operating Permit Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Paragraph D.1.7 has a subparagraph (a) but does not include a subparagraph (b).

Response to Comment 1:

IDEM agrees with the recommended changes and has re-lettered the subparagraphs as follows:

D.1.7 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 (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the HAP and VOC usage limits and/or the HAP and VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The HAP and VOC content of each coating material and solvent used;
 - (2) The amount of coating material and solvent less water used on daily 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 VOC and HAP content of the coatings used for month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP monthly usage;
 - (6) The weight of HAP and VOC emitted for each compliance period.
- ~~(e)~~(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of daily and monthly inspections of the observations of the overspray from surface coating area while one or more of the paint guns are in operation from any of the paint booths.
- ~~(e)~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 2:

In the permit (sections: A.2(c), D1.1(c) and (b), D1.3 and D.1.4) and in the TSD (pages 1, 9 and 11), EU-070B is described as a paint boot. It would be more accurate to call it a paint room, because it does not have the properties of a spray booth as defined in 29 CFR 1910.107(b)(5)(i).

Response to Comment 2:

IDEM agrees with the recommended change, the description of EU-070B from paint booth to paint room has been changed in the permit as indicated in comment 2.

| |
|---------------------|
| IDEM Contact |
|---------------------|

- (a) Questions regarding this proposed Federally Enforceable State Operating Permit Renewal can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

| | |
|----------------------------|--|
| Source Name: | National Railroad Passenger Corporation |
| Source Location: | 202 Garstang Street, Beech Grove, IN 46107 |
| County: | Marion |
| SIC Code: | 4011 |
| Permit Renewal No.: | F097-25151-00014 |
| Permit Reviewer: | Bruce Farrar |

The Indiana Department of Environmental Management, Office of Air Quality (OAQ) has reviewed a permit renewal application from National Railroad Passenger Corporation relating to the operation of a trim shop and rail car painting of reconditioned locomotives and passenger cars.

History

On August 17, 2007, National Railroad Passenger Corporation submitted an application to the OAQ requesting to renew its operating permit. National Railroad Passenger Corporation was issued a FESOP renewal F097-16221-00014 on May 16, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) Paint booth identified as emission unit EU-069, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-069. This paint booth is located in the Diesel Shop Building.
- (b) One (1) Paint booth (small room) identified as EU-070A, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to two (2) stacks S-070A1 and S-070A2. This paint booth is located in the Trim Shop Building.
- (c) One (1) Paint booth identified as EU-070B, constructed before 1980, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to ten (10) stacks S-070B1 through S-070B10. This paint booth is located in the Trim Shop Building.
- (d) One (1) Paint booth identified as EU-071, constructed in May 2000, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-071. This paint booth is located in the Trim Shop Building.
- (e) One (1) Paint booth identified as EU-072, constructed in January 1994, equipped with three (3) air atomization spray guns or airless spray guns, using dry filters as control, and exhausting to stack S-072. This paint booth is located in the Truck and Forge Shop Building.
- (f) One (1) diesel powered transfer table, identified as DTT-01, constructed in 1978, equipped with a Caterpillar diesel engine and exhausting to a steel, eight (8) feet vertical

exhaust stack measuring four (4) inches in diameter, SDTT-01. This transfer table is located between the Trim Shop and Coach Shop Buildings.

- (g) Two (2) natural gas-fired Heat Treat Furnaces (HT-01 and HT-02), each 7.0 MMBtu/hr heat input, constructed in 1993, each exhausting to stacks SHT-01 and SHT-02, respectively. [326 IAC 6-2-4]

Insignificant Activities

- (a) Combustion related activities including space heaters, process heaters, heat treat furnaces, and boilers whose potential uncontrolled emission meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) including:

Two (2) natural gas-fired boilers (B-01 and B-02), each 2.1 MMBtu/hr heat input, constructed in 1993, each exhausting to stacks SB-01 and SB-02, respectively. [326 IAC 6-2-4]
- (b) A self-enclosed Grit Blaster System (EU-GBCF), constructed in 1985, that utilizes a reclaimer (cyclone separator) for grit (raw material) reuse and a dust collector or baghouse (CE-01) utilized as control equipment for particulate matter, complete with Donaldson Torit Ultraweb high efficiency nanofiber cartridge filters. The reclaimer and the associated equipment are considered integral to the process; with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, and exhausting to stack SGB-01. [326 IAC 6-3-2]
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (h) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (i) Activities performed using hand held equipment including surface grinding and machining metal operations.
- (j) Welding operations with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM-10) for each welding activity of less than five (5) pounds per hour or twenty-five (25) pounds per day.

Existing Approvals

Since the issuance of the FESOP, F097-16211-00014, issued on May 16, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Minor revision F097-18685-00014 issued on April 7, 2004.

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

Air Pollution Control Justification as an Integral Part of the Process

The applicant has submitted new justification for the grit blaster operation system (emission unit (EU) GBCF) as an integral part of the process. The GBCF is located in the Truck Shop building. This system utilizes a reclaimer (which is a cyclone separator for grit or raw material reuse) and the Donaldson Torit Ultraweb high efficiency nanofiber cartridge filters of the dust collector/baghouse (CE-01). The source has asked that the reclaimer be considered as an integral part of the grit blaster operation:

- (a) The grit blaster system is a fully enclosed booth with a grit recovery system in the grated floor of the booth, the latter which recovers the grit by vacuum to a reclaimer. The reclaimer separates the usable grit from the unusable grit and material removed during the blasting process. The recovered/usable grit is pneumatically transferred for reuse and the unusable grit and material removed are pneumatic transferred for disposal. The pneumatic conveyance systems are closed systems. The primary function of the pneumatically conveyance systems and the cyclone/filters, vent filters, and bag filters is to transport raw materials and separate raw materials from air when the materials have reached their destinations. The pneumatic transfer process cannot function without these filters.
- (b) Because of the cost associated with the high volume of grit that is required to clean a unit, the system is designed for grit capture and reuse. The grit blasting system cannot function without the reclaimer that recovers 95% of the grit. The remaining 5% of unusable grit and material removed is controlled by the high efficiency filters of the dust collector.
- (c) At a 95% recovery rate, 1,206.67 pounds of grit is reused per operating hour. The grit costs \$0.59 per pound, therefore the source achieves an estimated cost savings of \$711.03 per hour.

IDEM, OAQ has evaluated the justifications and agreed that the reclaimer (EU-GBCF) is performing the function of a cyclone separator. Therefore, the reclaimer will be considered as an integral part of the operation of the grit blaster system. Operating conditions in the proposed permit will specify that the reclaimer shall operate at all times when the grit recovery system is in operation.

Therefore, the PTE after control was used to determine the level of permit required for the grit blaster operation.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County.

| Pollutant | Designation |
|---|--|
| SO ₂ | Better than national standards. |
| CO | Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County. |
| O ₃ | Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹ |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated. |
| ¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5. | |

(a) Ozone Standards

- (1) 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.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Marion 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.

- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Unrestricted Emissions

The Permittee has agreed that they are major for Part 70 Permits 326 IAC 2-7 and Hazardous Air Pollutants 326 IAC 20. The calculations in Appendix A have been done for applicability purposes only.

| Pollutant | tons/year |
|-------------------|------------------------------------|
| PM | Less than 100 |
| PM ₁₀ | Less than 100 |
| PM _{2.5} | Less than 100 |
| SO ₂ | Less than 100 |
| VOC | greater than 100 and less than 250 |
| CO | Less than 100 |
| NO _x | Less than 100 |

| HAPs | tons/year |
|-------------|------------------|
| Single | Greater than 10 |
| Combined | Greater than 25 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Volatile Organic Compounds (VOC) is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP Renewal.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP 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) | | | | | | | | Combined HAPs |
|---|-------------------------------|-------------------------------|--------------------------|-----------------|------------------------------|--------------------------|--------------------------|---|---|
| | PM | PM ₁₀ [*] | PM _{2.5} | SO ₂ | VOC | CO | NO _x | Single HAP (worst case) | |
| Paint Booths EU-69, EU-70A, EU-70B, EU-71, and EU-72 ¹ | 32.48 | 32.48 ² | 32.48 ² | 0 | 93.5 | 0 | 0 | 9.7 ³ | 21.8 ³ |
| Diesel Engine | 0.97 | 0.97 | 0.97 | 0.91 | 1.11 | 2.96 | 13.71 | 0.18 | 3.09 ³ |
| All Heating Units | 1.36 | 1.36 | 1.36 | 0.43 | 3.93 | 59.97 | 71.39 | 1.28 | |
| Grinding/Welding | 7.28 | 6.45 | 6.45 | 0 | 0 | 0 | 0 | 0 | |
| Total Emissions | 42.09² | 41.26² | 41.26² | 1.34 | less than 100 | 62.93² | 85.11² | Single HAP: Less than 10 | Combination HAPs: Less than 25 |
| PSD | 250 | 250 | - | 250 | 250 | 250 | 250 | - | - |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | - | - | 100 | - | - | - | - | - | - |
| Part 70 Operating Permit | - | 100 | 100 | 100 | 100 | 100 | 100 | 10 | 25 |

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

1 Paint Booths EU-69, EU-70A, EU-70B, EU-71, and EU-72 are limited to less than 93.5 tons/year under 326 IAC 2-8 with EU-71 and EU-72 each limited to less than 25 tons/year to render 326 IAC 8-1-6 not applicable.

2 PTE before control/no control.

3 Limited PTE.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Nonattainment NSR because the emissions of PM_{2.5} are less than one hundred (100) tons per year.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

- (1) Boilers B-01 and B-02 each have a maximum heat input less than 10 MMBtu/hr and each was installed in 1993. Therefore, the New Source Performance Standards (NSPS) for Small Industrial - Commercial - Institutional Steam generating Units (40 CFR 60.40c - 48c), Subpart Dc, are not included in the permit.
- (2) The requirements for the NSPS (40 CFR Part 60), Subpart Kb, is not included, because all storage vessels have a capacity of less than 75 m³ (19,813 gallons).
- (3) The NSPS (40 CFR Part 60), Subpart MM, does not apply because the facility does not assemble or provide coating to automobiles or light trucks.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The source has agreed to limit their HAP emissions to less than 10 tpy for any single HAP and 25 tpy for combined HAPs through a FESOP. The source is not considered a major HAP source under this National Emission Standards for Hazardous Air Pollutants (NESHAPs). Therefore, only NESHAPs applicable to minor sources have been reviewed including:
 - (1) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Subpart T (40 CFR Part 63.460), the degreasing operations are not subject to the NESHAP (40 CFR Part 63.460), because the source does not utilize organic solvents for this operation.
 - (2) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM). The source is not a major source of HAPs because they have agreed to limit HAPS to less than 10 tons/year for a single HAP and 25 tons/year for a combination of HAPS.
 - (3) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations (40 CFR Part 63, Subpart HHHHHH). Because the source does not use a chemical strippers that contains methylene chloride and the source does not surface coat motor vehicle and mobile equipment.
 - (4) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX). Because the source is not primarily engaged in any of the nine source categories.

Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has a federally enforceable potential to emit which restricts VOC emissions to less than one hundred (100) tons per year, thus 326 IAC 1-5-2 does not apply.

326 IAC 1-6-3 (Preventative Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

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

Since this source is not one of the twenty-eight (28) listed sources under 326 IAC 2-2-1(w) and the source commenced construction prior to the applicability date of August 7, 1977, the source is not applicable to the requirements of 326 IAC 2-2-2 (PSD). The potential emissions from the coating operations are greater than major threshold levels, however actual VOC emissions have never exceeded major threshold levels. The source has accepted limits such that the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) do not apply.

326 IAC 2-4.1 (Hazardous Air Pollutants)

The source is not subject to 326 IAC 2-4.1 because the plant was manufactured prior to the applicability date of the rule (July 27, 1997) and the source is not a major source of hazardous air pollutants, as defined in 40 CFR 63. The modification which occurred in 2000 did not in and of itself have the potential to emit greater than ten (10) tons per year of any single HAP or twenty-five (25) tons per year of any combination of HAPs. This modification did not cause source wide limited potential to emit of an individual HAP or combination of HAPs to exceed the thresholds listed in 326 IAC 2-7-1(22), thus the source does not have major potential to emit for HAPs.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP)

- (a) Pursuant to this rule, source wide emissions of VOC shall be limited to less than one hundred (100) tons per year such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assure compliance with all applicable requirements at the time of FESOP issuance.
- (b) Pursuant to this rule, source wide emissions of HAPs shall be limited to less than ten (10) tons per year of any single HAP or twenty-five (25) tons per year of any combination of HAPs such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assures compliance with all applicable requirements at the time of FESOP issuance. Limiting source wide emissions of VOCs will limit the potential to emit of an individual HAP or combination of HAPs to below major thresholds. Therefore, the source will not fall within any of the categories listed in 326 IAC 2-7-2(a) and will comply with all applicable requirements at the time of the FESOP issuance.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the source is subject to this rule because the source is located in Marion County, except for the area of Washington Township east of Fall Creek and the area of Franklin Township south of Thompson Road and east of Five Points Road. Thus, opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. Compliance with 40 CFR Part 60.90, Subpart I satisfies the requirement for 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-5.1-1 (Particulate Matter Limitations Except Lake County)

The source is located in Marion County and it is not one of the sources listed in 326 IAC 6.5-6. The source is not subject to this rule because the source does not have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year. The table below summarizes the actual PM/PM₁₀ emissions from the source.

| | PTE | Actual Emissions (2004) |
|------------------|-------|-------------------------|
| PM | 42.21 | 0.00 |
| PM ₁₀ | 41.37 | 0.00 |

State Rule Applicability - Individual Facilities

Surface Coating: Paint Booths (EU-069, EU-70A, EU-070B, EU-071, and EU-072):

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

Particulate emissions from the surface coating processes (EU 069, EU 070A, EU 070B, EU 071, and EU 072) shall be controlled by a dry particulate filter and subject to the following:

the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Pursuant to 326 IAC 8-1-6 (New facilities; general reduction requirements), two (2) of the paint booths (EU-071 and EU-072) are subject to this rule based on the following:

- (1) there are no other applicable rules under Article 8;
- (2) each paint booth has potential VOC emissions in excess of 25 tons per year; and
- (3) each paint booth was constructed after January 1, 1980.

The potential VOC emissions for EU-071 and EU-072 have been restricted to less than 25.0 tons per emission unit per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, EU-071 and EU-072 are not subject to the requirements of 326 IAC 8-1-6.

EU-069, EU-070A and EU-070B were constructed prior to January 1, 1980. Therefore, they are not subject to 326 IAC 8-1-6.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The source is not subject to 326 IAC 8-2-2 because the source does not surface coat automobiles or light trucks.

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

EU-069, EU-070A and EU-070B are not subject to 326 IAC 8-2-9 because the source SIC code (4011, railroad transportation) is not one of the industrial categories applicable to this rule.

Boilers B-01 & B-02

326 IAC 6-2-4(a) Particulate Rules: Emission limitations for facilities specified in 326 IAC 6-2-1(d)

Pursuant to 326 IAC 6-2-4(a) (Particulate Rules: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the total particulate matter emissions specified in 326 IAC 6-2-1(d) from Boilers B-

01 and B-02, each of 2.1 MMBtu/hr and utilized for indirect heating purposes and constructed after September 21, 1983 (both constructed in 1993), shall be limited to 0.6 pounds per MMBtu heat input, since Q is less than 10 MMBtu/hr.

Engine & NG comfort heating units

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The source is not subject to 326 IAC 6-2-1 because the heating units operated by the source are not boilers.

326 IAC 6-3-2 Particulate emission limitations, work practices, and control technologies

The fuel used is natural gas and the definition of process weight; weight rate excludes gaseous fuels therefore there are no limits pursuant to 326 IAC 6-3-2.

Heat Treat

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The source is not subject to 326 IAC 6-2-1 because the heat treat furnaces are direct heating units.

326 IAC 6-3-2 Particulate emission limitations, work practices, and control technologies

The fuel used is natural gas and the definition of process weight; weight rate excludes gaseous fuels therefore there are no limits pursuant to 326 IAC 6-3-2.

Insignificant Activity Degreaser

326 IAC 8-3-2 (Cold Cleaner Operation); 326 IAC 8-3-5(Cold Cleaner Degreaser Operation and Control)

The activities identified as degreasing activities do not include performing organic solvent degreasing and do not result in VOC emissions because the material used does not contain VOCs. Therefore, 326 IAC 8-3 rule applicability is not included in this permit renewal.

Grinding-Abrasives

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Grit Blaster System (EU-GBCF) shall not exceed 3.02 (insert E as calculated below) pounds per hour when operating at a process weight rate of 1265 (insert the appropriate process weight) pounds per hour.

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

Interpolation of the data for the process weight rate up to 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

Welding Machining Operations

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-1 welding is exempt from 326 IAC 6-3-2, provided that less than six hundred twenty-five (625) pounds of rod or wire is consumed per day. The welding operations at this source consume less than six hundred twenty-five (625) pounds of rod or wire is consumed per day. Therefore no limits apply.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

FESOP Limitations [326 IAC 2-8-4]: Emission Controls Operation

- (a) In order to comply with FESOP limitations pursuant to 326 IAC 2-8-4, the control equipment (dry filters) for particulate matter for the spray coating operation, shall be in operation at all times, when the paint booths (EU-069, EU-070A, EU-070B, EU-071 and EU-072) are in operation.
- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating (paint) booth stacks (S-069, S-070A1 through S-070A2 (small room), S-070B1 through S-070B10, S-071, and S-072) while one or more of the of the paint guns are in operation.
- (c) Monthly inspections shall be performed of the coating emissions from the surface coating area and the presence of overspray on the nearby ground outside of the designated surface coating area.

Recommendation

The staff recommends to the IDEM Commissioner that this FESOP Second Renewal be approved. This recommendation is based on the following facts and conditions:

An application for the purposes of this review was received on August 17, 2007. The application process was completed on December 30, 2008.

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Conclusion

The operation of the trim shop and rail car painting operation for reconditioned locomotives and passenger rail cars, shall be subject to the conditions of the attached proposed FESOP Second Renewal No.: F097-25151-00014.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emission Calculations
SUMMARY**

Company Name: National Railroad Passenger Corporation
Address, City IN Zip: 202 Garstang Street, Beech Grove, Indiana 46107
Permit No.: F097-25151-00014
Reviewer: Bruce Farrar
Date: 11/30/2008

Uncontrolled Potential To Emit (PTE)

| Operations | Pollutants (ton/year) | | | | | | | | | |
|--|-----------------------|--------------|--------------|-------------|--------------|---------------|--------------|--------------|--------------|--------------|
| | PM | PM10 | PM2.5 | SO2 | NOx | VOC | CO | HAP single | | HAPs comb. |
| Surface Coating: | | | | | | | | Toluene | Xylene | |
| 1) EU-069 | | | | | | | | | | |
| 2) EU-070A | | | | | | | | | | |
| 3) EU-070B | 32.48 | 32.48 | 32.48 | - | - | 235.76 | - | 37.35 | 40.27 | 50.54 |
| 4) EU-071 | | | | | | | | | | |
| 5) EU-072 | | | | | | | | | | |
| Combustion: | | | | | | | | | Hexane | |
| 1) Natural Gas heating units | 1.36 | 1.36 | 1.36 | 0.43 | 71.39 | 3.93 | 59.97 | | 1.285 | 1.35 |
| | | | | | | | | Toluene | Xylene | |
| 2) Diesel Transfer Table | 0.97 | 0.97 | 0.97 | 0.91 | 13.71 | 1.11 | 2.96 | 0.18 | 0.13 | 1.24 |
| Grinding/Welding: | | | | | | | | | | |
| 1) Grinding-Abrasives** | 2.77 | 1.94 | 1.94 | - | - | - | - | - | Mn | |
| 2) Welding | 4.51 | 4.51 | 4.51 | - | - | - | - | - | 0.04 | 0.38 |
| Total Unlimited Source-wide Emissions | 42.09 | 41.26 | 41.26 | 1.34 | 85.11 | 240.80 | 62.93 | 37.53 | 40.39 | 53.51 |

Limited Potential To Emit (PTE)

| Operations | Pollutants (ton/yr) | | | | | | | | | |
|--|---------------------|-------------|-------------|-------------|--------------|----------------|--------------|---------------|---------------|---------------|
| | PM | PM10 | PM2.5 | SO2 | NOx | VOC | CO | HAP single | | HAPs comb. |
| Surface Coating: | | | | | | | | | | |
| 1) EU-069 | | | | | | | | | | |
| 2) EU-070A | | | | | | | | | | |
| 3) EU-070B | 6.50 | 6.50 | 6.50 | - | - | 93.80 | - | | 9.7 | 21.9 |
| 4) EU-071 | | | | | | | | | | |
| 5) EU-072 | | | | | | | | | | |
| Combustion: | | | | | | | | | | |
| 1) Natural Gas (Boilers B-01 and B-02) | 1.36 | 1.36 | 1.36 | 0.43 | 71.39 | 3.93 | 59.97 | | | |
| 2) Diesel Transfer Table | 0.97 | 0.97 | 0.97 | 0.91 | 13.71 | 1.11 | 2.96 | | | |
| Grinding/Welding: | | | | | | | | | | |
| 1) Grinding-Abrasives** | 2.77 | 1.94 | 1.94 | - | - | - | - | | | |
| 2) Welding | 4.51 | 4.51 | 4.51 | - | - | - | - | | | |
| Total Limited Source-wide Emissions | 16.1 | 15.3 | 15.3 | 1.34 | 85.11 | <100 | 62.93 | <10 | <10 | <25 |

Note **: Grit Blaster System reclaimers (EU-GBCF) before baghouse (CE-01), is integral to the process. Therefore, PTE after control was utilized in total source-wide emission calculations.

Company Name: National Railroad Passenger Corporation
Address City IN Zip: 202 Garstang Street, Beech Grove, Indiana 46107
Permit Number: F097-25151-00014
Reviewer: Bruce Farrar
Date: 11/30/08

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | PM/PM10/PM2.5 (ton/yr) | Transfer Efficiency | Control Efficiency |
|---|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|------------------------|---------------------|--------------------|
| Paint, alum/silver Kemacrylic | 7.99 | 54.57% | 0.0% | 54.6% | 0.0% | 40.00% | 45.00 | 0.050 | 4.36 | 4.36 | 9.81 | 235.44 | 42.97 | 7.15 | 80% | 80% |
| Paint, Black Polyurethane | 7.91 | 58.66% | 0.0% | 58.7% | 0.0% | 39.00% | 45.00 | 0.050 | 4.64 | 4.64 | 10.44 | 250.56 | 45.73 | 6.45 | 80% | 80% |
| water-based Catalyzed Epoxy, Pure White | 10.07 | 6.06% | 0.0% | 6.1% | 0.0% | 40.00% | 45.00 | 0.050 | 0.61 | 0.61 | 1.37 | 32.94 | 6.01 | 18.65 | 80% | 80% |
| Thinner, lacquer acrylic | 6.89 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 45.00 | 0.050 | 6.89 | 6.89 | 15.50 | 372.06 | 67.90 | 0.00 | 80% | 80% |
| Imron Primer Dry Accelerator | 7.54 | 98.45% | 0.0% | 98.5% | 0.0% | 1.34% | 45.00 | 0.050 | 7.42 | 7.42 | 16.70 | 400.85 | 73.15 | 0.23 | 80% | 80% |

Total Potential Emissions (ton/yr) **235.76**
32.48
Controlled PM (ton/year) **6.50**

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

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

PM10/PM2.5 emission is assumed equal to PM

PM/PM10/PM2.5 Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Controlled PM/PM10/PM2.5 Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)*(1-.8)

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

Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
HAP from Surface Coating Operations

Company Name: National Railroad Passenger Corporation
Address City IN Zip: 202 Garstang Street, Beech Grove, Indiana 46107
Permit Number: F097-25151-00014
Reviewer: Bruce Farrar
Date: 11/30/08

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Ethyl- benzene | Weight % Toluene | Weight % Formald- ehyde | Weight % Glycol Ethers* | Weight % Methanol | Xylene Emissions (ton/yr) | Ethyl- benzene Emissions (ton/yr) | Toluene Emissions (ton/yr) | Formal- dehyde Emissions (ton/yr) | Glycol Ethers Emissions (ton/yr) | Methanol Emissions (ton/yr) | Combined HAP Emissions (ton/yr) |
|----------------------------------|---------------------|--------------------------------------|------------------------|--------------------|-------------------------------|---------------------|-------------------------------|-------------------------------|----------------------|---------------------------------|--|----------------------------------|--|---|-----------------------------------|--|
| Paint, alum/silver Kemacrylic | 7.99 | 45.00 | 0.050 | 40.00% | 6.00% | 4.00% | 0.00% | 8.00% | 0.00% | 31.50 | 4.72 | 3.15 | 0.00 | 6.30 | 0.00 | 45.67 |
| Super COMBO Light Gray Primer | 9.61 | 45.00 | 0.050 | 5.00% | 0.00% | 20.00% | 0.00% | 0.00% | 0.00% | 4.74 | 0.00 | 18.94 | 0.00 | 0.00 | 0.00 | 23.68 |
| US-2 Reducer | 6.92 | 45.00 | 0.050 | 5.00% | 0.00% | 10.00% | 0.00% | 0.00% | 5.00% | 3.41 | 0.00 | 6.82 | 0.00 | 0.00 | 3.41 | 13.64 |
| Thinner, lacquer acrylic | 6.89 | 45.00 | 0.050 | 0.00% | 0.00% | 55.00% | 0.00% | 7.00% | 0.00% | 0.00 | 0.00 | 37.35 | 0.00 | 4.75 | 0.00 | 42.10 |
| Activator - Paint Stripper | 6.81 | 45.00 | 0.050 | 60.00% | 15.00% | 0.30% | 0.00% | 0.00% | 0.00% | 40.27 | 10.07 | 0.20 | 0.00 | 0.00 | 0.00 | 50.54 |

Note*: MEK was not counted in the HAP calculations, since U.S.EPA removed MEK from the HAP list on December 19, 2005.

40.27 10.07 37.35 0.00 6.30 3.41 50.54

Total Potential Emissions (ton/yr)

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Diesel Shop Natural Gas Fired Boiler No. 1 and No. 2
Company Name: National Railroad Passenger Corporation
Address City IN Zip: 202 Garstang Street, Beech Grove, Indiana 46107
Permit Number: F097-25151-00014
Reviewer: Bruce Farrar
Date: 11/30/2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

Emission Units (All natural gas units combined):

163

1427.9

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-------------|-------------|-------------|--------------|-------------|--------------|
| | PM* | PM10*/PM2.5 | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| Potential Emission in tons/yr | 1.36 | 5.43 | 0.43 | 71.39 | 3.93 | 59.97 |

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

| Emission Factor in lb/MMcf | HAPs - Organics | | | | |
|-------------------------------|-----------------|-----------------|---------------|---------------|---------------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 0.0015 | 0.0009 | 0.0535 | 1.2851 | 0.0024 |

| Emission Factor in lb/MMcf | HAPs - Metals | | | | |
|-------------------------------|---------------|---------------|---------------|---------------|---------------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 0.0004 | 0.0008 | 0.0010 | 0.0003 | 0.0015 |

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu or 1,000 MBH x 1,000/hr
MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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

| | |
|------|---|
| 4.20 | boiler 1&2 |
| 14 | heat treat furnace 1&2 |
| 8.52 | component shop, hoist shop, bldg 10 2nd flr, & A/C shop |
| 8.8 | wheel & powerhouse SW |
| 74.2 | trim shop glass gang, trim shop upholstery, truck shop, coach shop 2, fab shop, material control NE, combo shop ctr E, combo shop SE, material control NW, diesel shop SW |
| 33 | forge shop NE, forge shop SW, coach shop1 NE, coach shopp 1 ctr N, coach shop 1 NW, trim shop paint room |
| 19.8 | millwright shop, boilermaker shop, wood mill |

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (<600 HP)
Reciprocating**

**Company Name: National Railroad Passenger Corporation
Address City IN Zip: 202 Garstang Street, Beech Grove, Indiana 46107
Permit Number: F097-25151-00014
Reviewer: Bruce Farrar
Date: 11/30/08**

B. Emissions calculated based on output rating (hp)

Heat Output rating
Horsepower (hp)

101.0

| | Pollutant | | | | | | | | | |
|--|-------------|-------------|-------------|--------------|-------------|-------------|--------------|-------------|-------------|-------------|
| | PM* | PM10/PM2.5* | SO2 | NOx | VOC | CO | Formaldehyde | Benzene | Toluene | Xylenes |
| Emission Factor in lb/hp-hr (power output) | 0.0022 | 0.0022 | 0.00205 | 0.0310 | 0.0025 | 0.0067 | 0.00118 | 0.000933 | 0.000409 | 0.000285 |
| Potential Emission in tons/yr | 0.97 | 0.97 | 0.91 | 13.71 | 1.11 | 2.96 | 0.52 | 0.41 | 0.18 | 0.13 |

Methodology

Emission Factors are from AP42, Table 3.3-1 and Table 3.3-2

$$\text{Emission (tons/yr)} = [\text{hp} \times \text{Emission Factor (lb/hp-hr)} \times 8760 \text{ hr/yr}] / (2,000 \text{ lb/ton})$$

*PM emission factors are assumed to be equivalent to PM10/PM2.5 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10/PM2.5 which is condensable.

**Appendix A: Emission Calculations
Abrasive Blasting - Confined**

Company Name: National Railroad Passenger Corporation
Address City IN Zip: 202 Garstang Street, Beech Grove, Indiana 46107
Permit Number: F097-25151-00014
Reviewer: Bruce Farrar
Date: 11/30/2008

Truck Shop: Grit blaster operation system (#GBCF)

Table 1 - Emission Factors for Abrasives

| Abrasive | Emission Factor | |
|------------|---------------------|-----------------------|
| | lb PM / lb abrasive | lb PM10/PM2.5 / lb PM |
| Sand | 0.041 | 0.70 |
| Grit | 0.010 | 0.70 |
| Steel Shot | 0.004 | 0.86 |
| Other | 0.010 | |

Calculations

| | |
|--|-------|
| EF = emission factor (lb PM/ lb abrasive) From Table 1 = | 0.010 |
| FR = Flow Rate (lb/hr) = | 1265 |
| number of nozzles = | 1 |

Estimated Emissions

| | PM | PM10/PM2.5 | |
|-----------------|-------|------------|--------|
| Uncontrolled PM | 12.65 | 8.86 | lb/hr |
| Emissions = | 55.41 | 38.78 | ton/yr |
| Controlled PM | 0.63 | 0.44 | lb/hr |
| Emissions = | 2.77 | 1.94 | ton/yr |

Control Efficiency 95.0%

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Compliance with 326 IAC 6-3-2(e)

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

$$E = 3.016438059 \quad \text{lb/hr}$$

Compliance demonstrated after control with an emission rate of 0.63 lb/hr and a control efficiency of 95%

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: National Railroad Passenger Corporation
 Address City IN Zip: 202 Garstang Street, Beech Grove, Indiana 46107
 Permit Number: F097-25151-00014
 Reviewer: Bruce Farrar
 Date: 11/30/2008

| PROCESS | Max. electrode consumption per station (lbs/hr) | | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
|-------------------------------------|---|--------------------------------------|---|--------|--------|--------|-----------------------|-------|-------|-------|------------------|
| | | | PM = PM10/PM2.5 | Mn | Ni | Cr | PM = PM10/PM2.5 | Mn | Ni | Cr | |
| WELDING | | | | | | | | | | | |
| worst case | 35 | | 0.0211 | 0.0009 | | | 0.739 | 0.032 | 0.000 | 0 | 0.032 |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| FLAME CUTTING | Max. Metal Thickness Cut (in.) | Max. Metal Cutting Rate (in./minute) | EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)** | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
| | | | PM = PM10/PM2.5 | Mn | Ni | Cr | PM = PM10/PM2.5 | Mn | Ni | Cr | |
| worst case | 2.5 | 12 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 0.292 | 0.000 | 0.000 | 0.000 | 0.000 |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| EMISSION TOTALS | | | | | | | | | | | |
| Potential Emissions lbs/hr | | | | | | | 1.03 | | | | 0.03 |
| Potential Emissions lbs/day | | | | | | | 24.73 | | | | 0.76 |
| Potential Emissions (ton/yr) | | | | | | | 4.51 | | | | 0.14 |

METHODOLOGY

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

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: David Young
National Railroad Passenger Corp.
202 Garstang Street
Beech Grove, IN 46107

DATE: June 11, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP - Renewal
097 - 25151 - 00014

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Lew Wood, General Manager
Jon Akin ARCADIS
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Commissioner

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(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

June 11, 2009

TO: Beech Grove Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: National Railroad Passenger Corp.
Permit Number: 097 - 25151 - 00014

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

| | | | |
|----------------------------|---|---|--|
| IDEM Staff | LPOGOST 6/11/2009 National Railroad Passenger Corporation 097 - 25151 - 00014 (final) | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender |  Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | Type of Mail: CERTIFICATE OF MAILING ONLY | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|--|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | David Young National Railroad Passenger Corporation 202 Garstang Street Beech Grove IN 46107 (Source CAATS) Via confirmed delivery | | | | | | | | | | |
| 2 | | Lew Wood General Manager National Railroad Passenger Corporation 202 Garstang Street Beech Grove IN 46107 (RO CAATS) | | | | | | | | | | |
| 3 | | Beech Grove Public Library 1102 N Main St Beech Grove IN 46107-1595 (Library) | | | | | | | | | | |
| 4 | | Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department) | | | | | | | | | | |
| 5 | | Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party) | | | | | | | | | | |
| 6 | | Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party) | | | | | | | | | | |
| 7 | | Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official) | | | | | | | | | | |
| 8 | | Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official) | | | | | | | | | | |
| 9 | | Jon Akin ARCADIS 251 East Ohio Street #800 Indianapolis IN 46204 (Consultant) | | | | | | | | | | |
| 10 | | Beech Grove City Council and Mayors Office 806 Main St. Beech Grove IN 46107 (Local Official) | | | | | | | | | | |
| 11 | | Ms. Janet McCabe Improving Kids Environment 3951 N Meridian Street Suite 160 Indianapolis IN 46208-4062 (Affected Party) | | | | | | | | | | |
| 12 | | Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official) | | | | | | | | | | |
| 13 | | | | | | | | | | | | |
| 14 | | | | | | | | | | | | |
| 15 | | | | | | | | | | | | |

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