



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: March 11, 2008
RE: Stanrail Corporation / 089-26210-00406
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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Mr. Richard Rentschler
Stanrail Corporation
1225 Martin Luther King Drive
Gary, Indiana 46402

March 11, 2008

Re: 089-26210-00406
First Notice-Only Change to
M089-24690-00406

Dear Mr. Rentschler:

Stanrail Corporation was issued a Minor Source Operating Permit (MSOP) No. M089-24690-00406 on October 11, 2007 for a stationary rail car parts fabrication and painting source located at 1225 Martin Luther King Drive, Gary, Indiana 46402. On March 4, 2008, the Office of Air Quality (OAQ) received an application from the source requesting that the permit be updated to indicate that the existing degreasing station will no longer use an organic solvent. Therefore, the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) are no longer applicable to the degreasing station. This change at the source is considered a "minor physical change" as defined in 326 IAC 2-1.1-1(6). Pursuant to 326 IAC 2-1.1-3(h)(2), minor physical changes to a source do not require a permit revision under 326 IAC 2-6.1-6, if the minor physical change does not increase potential emissions from the source. This change to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(2).

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls.

Table with 8 columns: Process, PM, PM10, SO2, NOx, VOC, CO, HAPs. Rows include Existing Units (Before Modification), Eagle Kleen Degreasing (Removed), and Revised Potential to Emit.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

A.2 Emission Units and Pollution Control Equipment Summary

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

...

- (k) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:

- (1) One (1) metal boxcar parts surface coating spray booth, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
- (2) One conveyor line installed in 2007.
- (3) One degreasing station used to clean the doors prior to coating. **This degreasing station uses a non VOC solvent.**
- (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.

...
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ...
- (k) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
 - (1) One (1) metal boxcar parts surface coating spray booth, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
 - (2) One conveyor line installed in 2007.
 - (3) One degreasing station used to clean the doors prior to coating. **This degreasing station uses a non VOC solvent.**
 - (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- ...

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

~~The owner or operator of a conveyorized degreaser shall:~~

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

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

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

~~(a) — The owner or operator of the conveyorized degreaser shall ensure that the following control equipment requirements are met:~~

~~(1) — Equip the degreaser's entrances and exits with downtime covers which are closed when the degreaser is not operating.~~

~~(2) — Equip the degreaser with the following switches:~~

~~(A) — A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.~~

~~(B) — A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).~~

~~(C) — A vapor level control thermostat which shuts off sump heat when vapor level rises more than ten (10) centimeters (four (4) inches).~~

~~(3) — Equip the degreaser with entrances and exits which silhouette workloads in such a manner that the average clearance between the articles and the degreaser opening is either less than ten (10) centimeters (four (4) inches) or less than ten percent (10%) of the width of the opening.~~

~~(4) — Equip the degreaser with a drying tunnel, rotating or tumbling basket, or other equipment, which prevents cleaned articles from carrying out solvent or vapor.~~

~~(5) — Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

~~(6) — Equip the degreaser with one (1) of the following control devices:~~

~~(A) — A refrigerated chiller.~~

~~(B) — A carbon adsorption system with ventilation which, either the downtime cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic meters per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.~~

~~(C) — Other systems of demonstrated equivalent or better control as those outlined in clause (A) and (B). Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~(b) — The owner or operator of the conveyorized degreaser shall ensure that the following operating requirements are met:~~

~~(1) — Minimize solvent carryout emission by the following:~~

~~(A) — Racking articles to allow complete drainage.~~

~~(B) — Maintaining the vertical conveyor speed at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).~~

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

D.1.64 Preventative Maintenance Plan [326 IAC 1-6-3]

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

D.1.75 Volatile Organic Compounds (VOC)

...

D.1.86 Record Keeping Requirements

...

D.1.97 Record Keeping Requirements [326 IAC 8-9-6]

...

IDEM, OAQ has decided to make additional revisions to the permit as described below. The permit is revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

- (a) Section A.1 is revised to indicate that Lake County is now in nonattainment for the 1-hour ozone standard. Section A.1 is updated as follows:

Source Location Status: **Nonattainment for 1-hour ozone standard**

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian Williams, of my staff, at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Original signed by,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Stanrail Corporation
Gary, Indiana
Permit Reviewer: Brian Williams

Page 5 of 5
Notice-Only Change No. 089-26210-00406

Attachments: Updated Permit

IC/BMW

cc: File - Lake County
Lake County Health Department
U.S. EPA, Region V
Air Compliance Section
IDEM Northwest Regional Office
Local Agency
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing and Training Section



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

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M089-24690-00406	
Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 11, 2007 Expiration Date: October 11, 2012
First Notice-Only Change No.: M089-26210-00406	Pages Affected: Entire Permit
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 11, 2008 Expiration Date: October 11, 2012

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary rail car parts fabrication and painting source.

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

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) dip coating operation for uncoupling levers, identified as Line 4, installed in 2003, consisting of the following:
 - (1) Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.
 - (2) One (1) conveyor line.
 - (3) One (1) robotic MIG welding station.
- (b) One (1) dip coating operation for nailable steel channels for railcar flooring, identified as Line 3, consisting of the following:
 - (1) One (1) dip tank located in the paint drying room, applying extreme performance coatings, identified as Line 3 dip tank, installed in 1995, capacity: forty (40) steel floor channels per hour.
 - (2) One (1) conveyer line, identified as Line 3 conveyer line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.
 - (3) One (1) welding station, identified as Line 3 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: five (5) pounds of wire per hour, each.

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

- (a) This permit, M089-24690-00406, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and GDEA, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ and GDEA, within a reasonable time, any information that IDEM, OAQ and GDEA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and GDEA copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

and

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

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and GDEA on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

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

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

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

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M089-24690-00406 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

Request for renewal shall be submitted to:

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

and

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and GDEA on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ and GDEA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and GDEA any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

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

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

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

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ and GDEA within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and GDEA, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

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

All required notifications shall be submitted to:

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

and

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

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

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

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

and

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and GDEA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and GDEA if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

and

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and GDEA on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and GDEA. The general public may request this information from the IDEM, OAQ and GDEA under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) dip coating operation for uncoupling levers, identified as Line 4, installed in 2003, consisting of the following:
 - (1) Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.
 - (2) One (1) conveyor line.
 - (3) One (1) robotic MIG welding station.
- (b) One (1) dip coating operation for nailable steel channels for railcar flooring, identified as Line 3, consisting of the following:
 - (1) One (1) dip tank located in the paint drying room, applying extreme performance coatings, identified as Line 3 dip tank, installed in 1995, capacity: forty (40) steel floor channels per hour.
 - (2) One (1) conveyer line, identified as Line 3 conveyer line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.
 - (3) One (1) welding station, identified as Line 3 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: five (5) pounds of wire per hour, each.
- (c) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) plasma cutting torches (capacity: less than or equal to 0.375 inch thick steel cut at one hundred fifty (150) inches per minute), and six (6) oxy fuel cutting torches (capacity: less than or equal to 2.5 inch thick steel cut at twenty (20) inches per minute), installed in 2001.
- (d) One (1) electric resistance welder with no emissions, installed in 2000.
- (e) One (1) rollform area, installed in 1996, consisting of:
 - (1) Two (2) rollformers equipped with electric motors with no emissions.
 - (2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.
 - (3) Uncoilers.
- (f) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.
- (g) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (h) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (i) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.

- (j) Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.
- (k) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
 - (1) One (1) metal boxcar parts surface coating spray booth, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
 - (2) One conveyor line installed in 2007.
 - (3) One degreasing station used to clean the doors prior to coating. This degreasing station uses a non VOC solvent.
 - (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- (l) One (1) Small Parts coating booth applying extreme performance coatings, with a maximum capacity of 1 gallon of coating applied per hour when coating small parts, with particulate emission controlled by a dry filter system exhausting through Stack V-2. The booth is primarily used for coating small parts for rail cars; however, the booth may also be used for coating rail bogies or other large pieces when necessary, with a maximum capacity of 1.25 gallons of coating per hour.
- (m) Thirty-three (33) MIG welders.

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

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

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

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

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

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

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

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

- (a) Particulate from the surface coating operations, identified as Line 6 and Small Parts Booth, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four

(4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventative Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.5 Volatile Organic Compounds (VOC)

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

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

D.1.6 Record Keeping Requirements

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

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

D.1.7 Record Keeping Requirements [326 IAC 8-9-6]

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

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

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

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

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

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

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

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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