



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)

for Tangent Rail Products, Inc. in Pike County

Permit No. M125-29288-00034

The Indiana Department of Environmental Management (IDEM), has received an application from Tangent Rail Products, Inc. located 3818 S CR 50 E, Winslow, Indiana 47598 for a renewal of their MSOP M125-20663-00034 issued on September 20, 2005. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Tangent Rail Products, Inc. to continue to operate their creosote wood preserving operation.

This draft Minor Source Operating Permit (MSOP) does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM's preliminary findings are available at:

Winslow Public Library
105 Center Street
Winslow, Indiana 47598

and

IDEM Southwest Regional Office (SWRO)
1120 Vincennes Ave., P.O. Box 128
Petersburg, Indiana 47567

and

IDEM Southeast Regional Office (SERO)
820 West Sweet Street
Brownstown, Indiana 47220-9557

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will

make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number **M125-29288-00034** in all correspondence.

Comments should be sent to:

Marcia Earl
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0863
Or dial directly: (317) 233-0863
E-mail: mearl@idem.in.gov

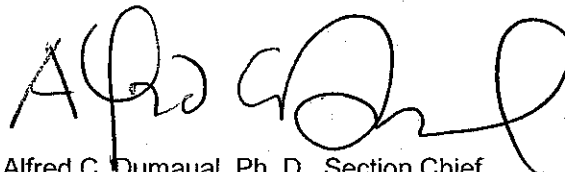
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251, the IDEM Southwest Regional Office and IDEM Southeast Regional Office.

If you have any questions please contact Marcia Earl of my staff at the above address.



Alfred C. Dumauval, Ph. D., Section Chief
Permits Branch
Office of Air Quality

ACD/me



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DRAFT

**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

**Tangent Rail Products, Inc.
3818 S CR 50 E
Winslow, Indiana 47598**

(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.: M125-29288-00034	
Issued by:	Issuance Date:
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary railroad ties are pressure treated with creosote.

Source Address:	3818 S CR 50 E, Winslow, Indiana
General Source Phone Number:	(812) 789-5331
SIC Code:	2491
County Location:	Pike (Patoka Township)
Source Location Status:	Attainment for all 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:

The source consists of the following permitted emission units:

- (a) One (1) wood-fired boiler, installed in 1983, with a maximum output rating of 200 horsepower per hour and a maximum heat input capacity of 6.69 MMBtu/hr, using briquette style wood chips bought off-site;
- (b) Four (4) fixed roof tanks, identified as Tank 1 and Tank 2, constructed in 1996, Tank 3 and Tank 4, constructed in 2005, each with a maximum storage capacity of 29,610 gallons of creosote, and each with a maximum annual throughput of 1,250,000 gallons of creosote;
- (c) One (1) diesel fuel storage tank, installed in 1983, with a maximum capacity of 2,000 gallons;
- d) Two (2) woodworking operations:
 - (1) one (1) switch-tie operation consists of one (1) trim/rough cut saw constructed in 1983, with a capacity of 1,500 ties per day, controlled by a 5,600 acfm cyclone with an inlet grain loading of 0.07 grains/acfm, that exhausts to the atmosphere.
 - (2) one (1) cross-tie operation consists of one (1) double trim/rough cut saw constructed in 2008, with a capacity of 6,000 ties per day, controlled by a 5,250 acfm cyclone that exhausts to the atmosphere;
- (d) Two (2) woodworking operations consisting of two (2) trim/rough cut saws each, installed in 1983 and 2008, with a combined maximum capacity of 7,500 ties per day, controlled by a cyclone (inlet flow of 5600 acfm and inlet grain loading of 0.07 grains/acfm), and exhausting to the atmosphere;

- (e) One (1) storage silo, identified as Wood Chip Silo, constructed in 1983, with a maximum storage capacity of 42,000 pounds of wood chips;
- (f) Two (2) pressure vessels, identified as Cyl-1 and Cyl-3, constructed in 1980, with a maximum capacity of 2,500 gallons of creosote per day, each with two (2) charges per day, per cylinder, with a maximum combined capacity of treating 13,618 cubic feet of wood per day;
- (g) One (1) wood chip conveyor system, installed in 1983, with a maximum capacity of 42,000 pounds of wood chips per day; and
- (h) Grinding and machining operations controlled with fabric filters 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 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (i) One (1) wood fired furnace, identified as WF1, approved for construction in 2010, with a maximum heat input of 1.4MMBtu/hr used for building heat.

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, M125-29288-00034, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M125-29288-00034 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.11 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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

**B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 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
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 an affirmation that the statements in the application are true and complete 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.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (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.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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.

- (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. The requirement to use an Indiana Licensed 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) For performance testing required by this permit, 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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.11 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.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

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

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

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

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) wood-fired boiler, installed in 1983, with a maximum rating of 200 horsepower per hour, using briquette style wood chips bought off-site;
- (i) One (1) wood fired furnace, identified as WF1, approved for construction in 2010, with a maximum heat input of 1.4MMBtu/hr used for building heat.

(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 Particulate (PM) Emissions [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-4(a) particulate emissions from the wood-fired boiler shall not exceed 0.6 lbs/MMBtu.

D.1.2 Wood-fired Boiler Operation

- (a) In order to render the provisions of 40 CFR 60, Subpart AAAA not applicable, the Permittee shall not combust municipal solid waste, as defined in 40 CFR 60.1465, in the one (1) wood-fired boiler. Municipal solid waste includes: household, commercial/retail, or institutional waste. Household waste includes material discarded by residential dwellings, hotels, motels, and other similar permanent or temporary housing. Commercial/retail waste includes material discarded by stores, offices, restaurants, warehouses, nonmanufacturing activities at industrial facilities, and other similar establishments or facilities. Institutional waste includes materials discarded by schools, by hospitals (nonmedical), by nonmanufacturing activities at prisons and government facilities, and other similar establishments or facilities. The Permittee may combust the following in the one (1) wood-fired boiler; wood pallets; construction, renovation, and demolition wastes (which include railroad ties and telephone poles); clean wood (defined as untreated wood or untreated wood products including clean untreated lumber, whole or chipped tree stumps, and whole or chipped tree limbs); industrial process or manufacturing waste as allowed by the rule as defined in 40 CFR 60.1454.
- (b) In order to render the provisions of 40 CFR 60, Subpart EEEE not applicable, the Permittee shall not combust municipal solid waste, as defined in 60 CFR 60.2977, in the one (1) wood-fired boiler. Municipal solid waste includes refuse (and refuse-derived fuel) collected from the general public and from residential, commercial, institutional, and industrial sources consisting of paper, wood, yard wastes, food wastes, plastics, leather, rubber, and other combustible materials and non-combustible materials such as metal, glass and rock. Municipal solid waste does not include industrial process wastes or medical wastes that are segregated from such other wastes. An incineration unit shall not be considered to be combusting municipal solid waste for purposes of this subpart if it combusts a feed stream 30 percent or less of the weight of which is comprised, in aggregated, of municipal solid waste, as determined by 40 CFR 60.2887(b).

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) Two (2) woodworking operations :

(1) one (1) switch-tie operation consists of one (1) trim/rough cut saw constructed in 1983, with a capacity of 1,500 ties per day, controlled by a 5,600 acfm cyclone with an inlet grain loading of 0.07 grains/acfm, that exhaust to the atmosphere.

(2) one (1) cross-tie operation consists of one (1) double trim/rough cut saw constructed in 2008, with a capacity of 6,000 ties per day, controlled by a 5,250 acfm cyclone that exhausts to the atmosphere;

(g) One (1) wood chip conveyor system, installed in 1983, with a maximum capacity of 42,000 pounds of wood chips per day; and

(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.2.1 Particulate (PM) Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate emissions from the woodworking operation and wood conveyor system shall not exceed the pound per hour emission rate listed below.

Units	Process Weight Rate (tons/hour)	326 IAC 6-3-2 Allowable Emission Rate (lbs/hour)
Wood chip conveyor system	0.88	3.76
Trim/rough cut saws	46.88	43.98

The pounds per hour allowable emission rate is calculated using the following equations:

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

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

and

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the following equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

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

A Preventive Maintenance Plan is required for the woodworking operation and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Tangent Rail Products, Inc.
Address:	3818 S CR 50 E
City:	Winslow, Indiana 47598
Phone #:	(812) 789-5331
MSOP #:	M125-29288-00034

I hereby certify that Tangent Rail Products, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Tangent Rail Products, Inc. is :

in compliance with the requirements of MSOP M125-29288-00034.

not in compliance with the requirements of MSOP M125-29288-00034.

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

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Tangent Rail Products, Inc.
Source Location:	3818 S CR 50 E, Winslow, Indiana 47598
County:	Pike (Pakota Township)
SIC Code:	2491
Permit Renewal No.:	M125-29288-00034
Permit Reviewer:	Marcia Earl

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Tangent Rail Products, Inc. relating to the operation of a creosote wood preserving operation with the aid of a wood-fired boiler. On May 21, 2010, Tangent Rail Products, Inc. submitted an application to the OAQ requesting to renew its operating permit. Tangent Rail Products, Inc. was issued a MSOP (M125-20663-00034) on September 20, 2005.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) wood-fired boiler, installed in 1983, with a maximum output rating of 200 horsepower per hour and a maximum heat input capacity of 6.69 MMBtu/hr, using briquette style wood chips bought off-site;
- (b) Four (4) fixed roof tanks, identified as Tank 1 and Tank 2, constructed in 1996, Tank 3 and Tank 4, constructed in 2005, each with a maximum storage capacity of 29,610 gallons of creosote, and each with a maximum annual throughput of 1,250,000 gallons of creosote;
- (c) One (1) diesel fuel storage tank, installed in 1983, with a maximum capacity of 2,000 gallons;
- (d) Two (2) woodworking operations :
 - (1) one (1) switch-tie operation consists of one (1) trim/rough cut saw constructed in 1983, with a capacity of 1,500 ties per day, controlled by a 5,600 acfm cyclone with an inlet grain loading of 0.07 grains/acfm, that exhausts to the atmosphere;
 - (2) one (1) cross-tie operation consists of one (1) double trim/rough cut saw constructed in 2008, with a capacity of 6,000 ties per day, controlled by a 5,250 acfm cyclone that exhausts to the atmosphere;
- (e) One (1) storage silo, identified as Wood Chip Silo, constructed in 1983, with a maximum storage capacity of 42,000 pounds of wood chips;
- (f) Two (2) pressure vessels, identified as Cyl-1 and Cyl-3, constructed in 1980, with a maximum capacity of 2,500 gallons of creosote per day, each with two (2) charges per

day, per cylinder, with a maximum combined capacity of treating 13,618 cubic feet of wood per day;

- (g) One (1) wood chip conveyor system, installed in 1983, with a maximum capacity of 42,000 pounds of wood chips per day; and
- (h) Grinding and machining operations controlled with fabric filters 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 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (i) One (1) wood fired furnace, identified as WF1, approved for construction in 2010, with a maximum heat input of 1.4MMBtu/hr used for building heat.

Existing Approvals

Since the issuance of the MSOP 125-20663-00034 on September 20, 2005, the source has constructed or has been operating under the following additional approvals:

- (a) First Notice Only Change No. 125-21964-00034 issued on November 30, 2005; and
- (b) Second Notice Only Change No. 125-23548-00034 issued on October 23, 2006
- (c) Third Notice Only Change No. 125-26618-00034 issued on June 23, 2008.

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.

IDEM has made the following changes to clarify Sections B, C, D.1, and D.2 of the permit:

Change No. 1

For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section C... contains the Permittee's obligations with regard to the records required by this condition."

Change No. 2

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also required certifications.

Change No. 3

IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than".

Change No. 4

IDEM has decided to clarify Section B - Preventive Maintenance Plan.

Change No. 5

IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.

Change No. 6

IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

Change No. 7

IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.

Change No. 8

IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures

Change No 9

IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required state what methods shall be used.

Change No. 10

IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

Change No. 11

IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emission minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline, and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

Change No. 12

The voice of paragraph (b) of Section C - General Record Keeping Requirements has been change to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

Change No. 13

IDEM has decided to allow the Permittee the option of using manufacturer's recommendations for the calibration frequency.

Change No. 14

IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

Enforcement Issue

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A, pages 1 through 8 of this document for detailed emission calculations.

County Attainment Status

The source is located in Pike County (Patoka Township).

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, 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	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for the Washington Twp for PM _{2.5} . The remainder of Pike County is unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Pike County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Pike County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
 Pike County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Tons/year
PM	61.31
PM ₁₀	58.88
PM _{2.5}	56.57
SO ₂	0.89
VOC	22.57
CO	21.26
NO _x	17.36

HAPs	tons/year
Hydrogen Chloride	0.67
Naphthalene	3.01
Benzene	0.17
Formaldehyde	0.16
Acrolein	0.14
Dibenzofuran	0.11
Xylene	0.07
Styrene	0.07
Toluene	0.03
m-Cresol	0.01
p-Cresol	0.01
Ethylbenzene	0.01
Phenol	0.03
Quinoline	0.10
Biphenyl	0.01
Total	4.62

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants is less than 100 tons per year. However, the potential to emit PM, PM10, and PM2.5 are each greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators For Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D (60.40 through 60.46) (326 IAC 12), are not included in the permit since the wood-fired boiler does not have the capability of firing fossil-fuel.
- (b) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units for which Construction is Commenced After September 18, 1978, 40 CFR 60, Subpart Da (60.40da through 60.52da) (326 IAC 12), are not included in the permit since the wood-fired boiler is not an electric utility steam generating unit.
- (c) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db (60.40b through 60.48b) (326 IAC 12), are not included in the permit since the wood-fired boiler has a maximum heat input capacity of less than 100 MMBtu/hr.
- (d) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generation Units, 40 CFR 60, Subpart Dc (60.40c through 60.48c) (326 IAC 12) are not included in the permit for the wood-fired boiler since the boiler has a maximum design heat input capacity of less than 10 MMBtu/hr.
- (e) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generation Units, 40 CFR 60, Subpart Dc (60.40c through 60.48c) (326 IAC 12) are not included in the permit for the wood-fired furnace, because the wood-fired furnace is not a steam generating unit.
- (f) The requirements of the following New Source Performance Standards (NSPS) are not included in this permit, since this source does not "produce" chemicals (see note below). This source treats wood with creosote.
 - (1) 40 CFR 60, Subpart VV (60.480 through 60.489), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (326 IAC 12);
 - (2) 40 CFR 60, Subpart III (60.610 through 60.617), Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (326 IAC 12);
 - (3) 40 CFR 60, Subpart NNN (60.660 through 60.668), Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12); and
 - (4) 40 CFR 60, Subpart RRR (60.700 through 60.708), Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12).

Note: The major processing steps employed in Synthetic Organic Chemicals Manufacturing Industry (SOCMI) can be classified in two broad categories: conversion and separation. Conversion processes are chemical reactions that alter the molecular structure of the compounds involved. Separation operations divide mixtures into distinct

fractions. [References: (1) EPA Office of Compliance Sector Notebook Project: Profile of the Organic Chemical Industry, 2nd Edition (EPA/310-R-02-001), November 2002, Section III.A.1, page 11; (2) Distillation Operations In Synthetic Organic Chemical Manufacturing - Background Information For Proposed Standards (EPA-450/3-83-005a), December 1983, Chapter 3, page 3-1; and (3) Guideline Series: Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry (EPA-450/4-91-031), August 1993, Chapter 2, page 2-1.]

- (g) The requirements of the New Source Performance Standards for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, Or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, 40 CFR 60, Subpart K (60.110 through 60.113) (326 IAC 12) are not included in this permit, since the one diesel fuel storage tank and the four (4) creosote storage tanks (Tank 1 through Tank 4) were each constructed after May 19, 1978 and each have a storage capacity of less than 40,000 gallons. The requirements of 40 CFR 60, Subpart K, are not included in the permit for the two (2) pressure vessels (Cyl-1 and Cyl-3), since they are process vessels, which are not considered storage vessels.
- (h) The requirements for the New Source Performance Standards for Storage Vessels for Petroleum Liquids For Which construction, Reconstruction, Or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60, Subpart Ka (60.110a through 60.115a) (326 IAC 12) are not included in this permit, since the one (1) diesel fuel storage tank and the four (4) creosote storage tanks (Tank 1 through Tank4) each have a storage capacity of less than 40,000 gallons and the four (4) creosote storage tanks (Tank 1 through Tank 4) were each constructed after July 23, 1984. The requirements of 40 CFR 60, Subpart Ka, are not included in the permit for the two (2) pressure vessels (Cyl-1 and Cyl-3), since they are process vessels, which are not considered storage vessels.
- (i) The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR, Subpart Kb (60.110b through 60.117b) (326 IAC 12) are not included in this permit for the one (1) diesel fuel oil storage tank, the two (2) pressure vessels (Cyl-1 and Cyl-2) and the four (4) creosote tanks (Tank 1 through Tank 4) based on the following:
- (1) 40 CFR 60, Subpart Kb is not included for the one (1) fuel storage tank since it was constructed before July 23, 1984 and has a maximum storage capacity of less than 75 cubic meters (19,813 gallons).
 - (2) 40 CFR 60, Subpart Kb is not included for the two (2) pressure vessels (Cyl-1 and Cyl-2), since they are process vessels, which are not considered storage vessels.
 - (3) 40 CFR 60, Subpart Kb is not included for the four (4) creosote tanks (Tank 1 through Tank 4) (each constructed after July 23, 1984 and each having a storage capacity greater than or equal to 75 cubic meters (19,813 gallons) and less than 151 cubic meters (40,000 gallons)), since they each store creosote with a maximum true vapor pressure of 6 kilopascals (kPa) (at the storage temperature), which is less than the applicability threshold of 15.0 kPa for this specific range of tank size [40 CFR 60.110b(b)]
- (j) The requirements of the New source Performance Standard for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001, 40 CFR 60,

Subpart AAAA (60.1000 through 60.1465) (326 IAC 12), are not included in this permit, since the (1) wood-fired boiler and the one (1) wood-fired furnace do not burn municipal waste as defined in the rule.

- (k) The requirements of the New Source Performance Standard for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced After November 30, 1999 or for Which Modification or Reconstruction is commenced On or After June 1, 2001, 60 CFR 60, Subpart CCCC (60.2000 through 60.2265), are not included in this permit, since the one (1) wood-fired boiler and the one (1) wood-fired furnace do not burn commercial or industrial waste as defined in 40 CFR 60.2265.
- (l) The requirements of the New Source Performance Standards for Other solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006, 40 CFR 60, Subpart EEEE (60.2280 through 60, 2891, are not included in this permit, since the one (1) wood-fired boiler and the one (1) wood-fired furnace do not burn municipal solid waste as defined in 40 CFR 60,2977.
- (m) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (n) The requirements of the following National Emission Standard for Hazardous Air Pollutants (NESHAPs) are not included in this permit, since this source is not a major source of HAPs and this source does not "manufacture" chemicals (see note 1 below). This source treats wood with creosote
 - (1) 40 CFR 63 Subpart F (63.100 through 63.107), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry (326 IAC 20-11)
 - (2) 40 CFR 63 Subpart G (63.110 through 63.153), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (326 IAC 20-11)
 - (3) 40 CFR 63 Subpart H (63.160 through 63.183), NESHAPs: Organic Hazardous Air Pollutants for Equipment Leaks (326 IAC 20-11)
 - (4) 40 CFR 63 Subpart I (63.190 through 63.193), NESHAPs: Certain Processes Subject to the Negotiated Regulation for Equipment Leaks (326 IAC 20-12)
 - (5) 40 CFR 63 Subpart FFFF (63.2430 through 63.2550), NESHAPs: Miscellaneous Organic Chemical Manufacturing (326 IAC 20-84)

Note 1: The major processing steps employed in Synthetic Organic Chemicals Manufacturing Industry (SOCMI) can be classified in two broad categories: conversion and separation. Conversion processes are chemical reactions that alter the molecular structure of the compounds involved. Separation operations divide mixtures into distinct fractions. [References: (1) EPA Office of Compliance Sector Notebook Project: Profile of the Organic Chemical Industry, 2nd Edition (EPA/310-R-02-001), November 2002, Section III.A.1, page 11; (2) Distillation Operations In Synthetic Organic Chemical Manufacturing - Background Information For Proposed Standards (EPA-450/3-83-005a), December 1983, Chapter 3, page 3-1; and (3) Guideline Series: Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry (EPA-450/4-91-031), August 1993, Chapter 2, page 2-1.]

- (o) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

- (p) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne. This source is subject to the opacity limitations specified in 326 IAC 5-1-2.

State Rule Applicability – Individual Facilities

State Rule Applicability – Boiler

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

Pursuant to 326 IAC 6-2-4(a), for a total source maximum operating capacity rating of Q of less than ten (10) MMBtu/hr, the particulate matter shall not exceed 0.6. Therefore, the particulate matter emission from the wood-fired boiler shall not exceed 0.6 pound per MMBtu heat input. For Q greater than or equal to ten (10) MMBtu/hr, the emission limitations are based on the following equation given in 326 IAC 6-2-4

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

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the wood-fired boiler is 6.6892 MMBtu/hr.

Based on the AP-42 particulate emission factor for dry wood combustion, the potential to emit particulate emissions of the wood-fired boiler is 0.4 pounds per million British thermal units. Therefore, the wood-fired boiler is able to comply with this rule when burning dry clean wood.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the wood-fired boiler is not subject to the requirements of 326 IAC 7-1.1, since it has a potential to emit sulfur dioxide (SO₂) of less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

State Rule Applicability – Tanks T1 through T4

326 IAC 8-1-6 (General Volatile Organic Compounds Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have the potential to emit volatile organic compound (VOC) emission of 25 tons per year or more. The four (4) creosote tanks (Tanks T1 through T4) (each constructed after 1980) are not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions less than 25 tons per year.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

This source is not located in Lake, Porter, Clark or Floyd counties. Therefore, the requirement of 326 IAC 8-9-1 are not included in this permit.

State Rule Applicability – Pressure Vessels, Cyl-1 and Cyl-3

326 IAC 8-1-6 (New facilities; general reduction requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have the potential to emit volatile organic compound (VOC) emission of 25 tons per year or more. The two (2) pressure vessels (Cyl-1 and Cyl-3) (each constructed after 1980) are not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions less than 25 tons per year.

State Rule Applicability – Diesel Storage Tank

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

This rule applies to facilities of petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000) gallons containing volatile organic compounds. The capacity of the one (1) diesel storage tank is less than 39,000 gallons. Therefore, 326 IAC 8-4-3 does not apply to these tanks.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

Pursuant to 326 IAC 8-4-6(a)(8), "Gasoline dispensing facilities" means any facility where gasoline is dispensed into motor vehicle fuel tanks or portable containers from a storage tanks with a capacity of 575 gallons or more. Diesel fuel is not considered to be motor vehicle fuel. Therefore, 326 IAC 8-4-6 does not apply.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The diesel storage tank was constructed in 1983 and is not located in Clark, Floyd, Lake or Porter County. Therefore, 326 IAC 8-9 does not apply.

State Rule Applicability – Woodworking Operations

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

The particulate emissions from woodworking operations and wood conveyor system shall not exceed the pound per hour allowable emission rate established as E in the following formulas:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished for the wood chip conveyor by use of the following equation:

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

and

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished for the trim/rough cut saws by use of the following equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The allowable emissions rate E has been established for the units as follows:

Units	Process Weight Rate (tons/hour)	326 IAC 6-3-2 Allowable Emission Rate (lbs/hour)	Uncontrolled PTE of PM (lbs/hour)
Wood chip conveyor*	0.88	3.76	N/A
Trim/rough cut saws**	46.88	43.98	3.36

*The source purchases briquette style wood chip from off-site, stores the wood chips in a silo which gravity feeds to a conveyor. There are no emissions factors for this type of process and PM/PM10/PM2.5 emissions will be negligible. Therefore, the potential to emit PM/PM10/PM2.5 is based on 326 IAC 6-3-2 limitations.

** The tons per hour process weight rate was calculated as 7500 railroad ties per day divided by 24 hours in a day = 312.5 railroad ties per hour times an average weight for railroad ties of 300 pounds per railroad tie.

Based on the emission data provided by the source, the woodworking operation is able to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) without the use of the cyclone.

Wood-fired Furnace

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

This source is not subject to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d) because the one (1) wood-fired furnace is used for building heat and is not a source of indirect heating.

Recommendation

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

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

An application for the purposes of this review was received on May 21, 2010.

Conclusion

The operation of a creosote wood preserving operation shall be subject to the conditions of the attached MSOP Renewal No. M125-29288-00034.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Marcia Earl 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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: Emissions Calculations
Summary**

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

Facility	Uncontrolled PTE (tpy)								
	Pollutant								Worse Case HAP
	PM	PM10	PM2.5	NOx	SO2	CO	VOC	HAPs	
Woodworking	28.51	28.51	28.51	0.00	0.00	0.00	0.00	0.00	0.00
¹⁾ Wood Chip Storage and Conveyance	16.45	16.45	16.45	0.00	0.00	0.00	0.00	0.00	0.00
Wood Boiler and Wood Furnace	14.17	13.36	11.59	17.36	0.89	21.26	0.46	1.19	Hydrogen Chloride 0.67
Pressure Vessels	0.00	0.00	0.00	0.00	0.00	0.00	14.41	0.28	Naphthalene 0.20
Tanks 1-4 (Creosote)	0.00	0.00	0.00	0.00	0.00	0.00	1.68	0.31	Naphthalene 0.12
Unpaved Roads	2.18	0.55	0.02	0.00	0.00	0.00	0.00	0.00	N/A
Storage Yard	0.00	0.00	0.00	0.00	0.00	0.00	6.02	2.83	Naphthalene 2.69
Total	61.31	58.88	56.57	17.36	0.89	21.26	22.57	4.62	Hydrogen Chloride 0.67

Facility	Controlled PTE (tpy)								
	Pollutant								Worse Case HAP
	PM	PM10	PM2.5	NOx	SO2	CO	VOC	HAPs	
Woodworking	4.42	4.42	4.42	0.00	0.00	0.00	0.00	0.00	0.00
¹⁾ Wood Chip Storage and Conveyance	16.45	16.45	16.45	0.00	0.00	0.00	0.00	0.00	0.00
Wood Boiler and Wood Furnace	14.17	13.36	11.59	17.36	0.89	21.26	0.46	1.19	Hydrogen Chloride 0.67
Pressure Vessels	0.00	0.00	0.00	0.00	0.00	0.00	14.41	0.28	Naphthalene 0.20
Tanks 1-4 (Creosote)	0.00	0.00	0.00	0.00	0.00	0.00	1.68	0.31	Naphthalene 0.12
Unpaved Roads	2.18	0.55	0.02	0.00	0.00	0.00	0.00	0.00	N/A
Storage Yard	0.00	0.00	0.00	0.00	0.00	0.00	6.02	2.83	Naphthalene 2.69
Total	37.21	34.78	32.47	17.36	0.89	21.26	22.57	4.62	Hydrogen Chloride 0.67

¹⁾ The source purchases briquette style wood chip from off-site, stores the wood chips in a silo which gravity feeds to a conveyor. There are no emission factors for this type of process and PM/PM10/PM2.5 emissions will be negligible. Therefore, the potential to emit PM/PM10/PM2.5 is based on 326 IAC 6-3-2 limitations.

**Appendix A: Emission Calculations
PM/PM10/PM2.5 Emissions Calculations
Woodworking**

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

Control Device	Inlet Flow (acfm)	Inlet Grain Loading (grains/acfm)	Control Efficiency %	Controlled PTE of PM/PM10/PM2.5 (lbs/hr)	Controlled PTE of PM/PM10/PM2.5 (tpy)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)	Uncontrolled PTE of PM/PM10/PM2.5 (tpy)
Cyclone	5600	0.07	85.00%	0.50	2.21	3.36	14.72
Cyclone	5250	0.07	85.00%	0.50	2.21	3.15	13.80
TOTAL (tons/yr)					4.42		28.51

Methodology

Controlled PTE of PM/PM10/PM2.5 (lbs/hr) = [Inlet flow (ft³/min)] * [60 (min/hr)] * [Inlet grain loading (grains/ft³)] * [1/7000 grains/lb] * [1-control efficiency (%)]

Controlled PTE of PM/PM10/PM2.5 (tpy) = [Controlled PTE PM/PM10/PM2.5 (lbs/hr)] * [8760 (hrs/yr)] * [1/2000 lbs/ton]

Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) = [Inlet flow (ft³/min)] * [60 (min/hr)] * [Inlet grain loading (grains/ft³)] * [1/7000 grains/lb]

Uncontrolled PTE of PM/PM10/PM2.5 (tpy) = [Uncontrolled PTE PM/PM10/PM2.5 (lbs/hr)] * [8760 (hrs/yr)] * [1/2000 lbs/ton]

**Appendix A: Emissions Calculations
Combustion Boiler and Furnace
Wood Waste Combustion (uncontrolled)
Dry Wood**

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

Capacity Boiler (Horsepower/hr)	200	Capacity (MMBtu/hr)	6.6892	Total Capacity of boiler and Furnace	8.09
Capacity Furnace (MMBtu/hr)			1.40		

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.40	0.38	0.33	0.025	0.49	0.013	0.60
Potential Emissions in tons/yr Purchased Wood Chips	14.17	13.36	11.59	0.89	17.36	0.46	21.26

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emissions in tons/yr	0.14	0.15	0.16	0.67	0.07

TOTAL HAPs 1.19

Wet wood is considered to be greater than or equal to 20% moisture content.

Dry wood is considered to be less than 20% moisture content.

*The PM10 and PM2.5 emission factors include the condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent)

Methodology

1 hp/hr of boiler steam output = 33446 Btu/hr of boiler fuel input (from AP-42, Miscellaneous Data and Conversion Factors, Fifth Edition)
To convert from Horsepower capacity to MMBtu/hr capacity: Hp Rating * 3.3446⁴ (Btu/hr/hp) * 1MMBtu/10⁶ Btu

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Appendix A: Emission Calculations
Emissions Calculations
Pressure (Retore) Vessels

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

Maximum Treated Wood Throughput (ft³/day)* = 13618

Pollutant	AP-42 Emission Factor (lbs/ft ³)	PTE (lbs/day)	PTE (lbs/yr)	PTE (tpy)
VOCs	5.80E-03	78.98	28829.31	14.41
Dibenzofuran	3.50E-05	0.48	173.97	0.09
Naphthalene	7.90E-05	1.08	392.68	0.20

Total HAPs 0.28

Methodology

* The source has 2 pressure vessels that can process 6,809 ft³/day of treated wood, each.

AP-42 Emission Factors from AP-42 Chp. 10.8 Fifth Edition (08/99)

PTE (lbs/day) = [Maximum Treated Wood Throughput (ft³/day)] * [AP-42 emission factor (lbs/ft³ wood treated)]

PTE (lbs/yr) = PTE (lbs/day) * 365 days/year

PTE (tpy) = PTE (lbs/day) * 365 days/year * (1/2000 lbs/ton)

**Appendix A: Emissions Calculations
Volatile Organic Compounds (VOC) Emissions
Tanks 1-4**

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

As part of MSOP 125-20663-00034, issued September 20, 2005, the potential to emit VOC from standing storage (breathing loss) and working loss from the fixed roof creosote storage tanks was estimated using Equations (1) and (2) from Section 4.3 of Compilation of Air Pollution Emission Factors, AP-42 Fourth Edition, September 1985.

Breathing Loss (Lb, lbs/year)

$$Lb = 2.26E-2(Mv)[(P/(Pa-P))^{0.68}](D^{1.73})(H^{0.51})(dT^{0.50})(Fp)(C)(Kc)$$

Working Losses (Lw, lbs/year):

$$Lw = 2.40E-5(Mv)(P)(V)(N)(Kn)(Kc)$$

Parameter	Tank 1	Tank 2	Tank 3	Tank 4
Mv = molecular weight of vapor in storage tank (lb/lb-mole)	172	172	172	172
P = true vapor pressure of creosote at bulk liquid conditions (72oF) (psia)*	0.870	0.870	0.870	0.870
Pa = average atmospheric pressure at tank location (psia)	14.7	14.7	14.7	14.7
(P/(Pa-P))	0.0629	0.0629	0.0629	0.0629
D = tank diameter (ft)	12.0	12.0	12.0	12.0
H = average vapor space height, including roof volume correction (ft)	15.0	15.0	15.0	15.0
dT = average ambient diurnal temperature change (oF)	30.0	30.0	30.0	30.0
Fp = paint factor (medium gray, good condition) (dimensionless)	1.4	1.4	1.4	1.4
C = adjustment factor for tank diameter of 12 ft (dimensionless)	0.63	0.63	0.63	0.63
Kc = product factor for organic liquids (dimensionless)	1.0	1.0	1.0	1.0
Tank Height (ft.)	35.0	35.0	35.0	35.0
V = Tank Volume (gallons)	29610.0	29610.0	29610.0	29610.0
Annual Throughput (gallons/year)	500000	500000	500000	500000
N = Number of tank turnovers per year (dimensionless)	16.89	16.89	16.89	16.89
Kn = turnover factor (dimensionless)	1.0	1.0	1.0	1.0

Breathing Loss (Lb) (lbs/year) =	838.6	838.6	838.6	838.6
Working Loss (Lw) (lbs/year) =	0.0606	0.0606	0.0606	0.0606
Breathing and Working Loss (lbs/year) =	838.7	838.7	838.7	838.7
Breathing and Working Loss (tons/year) =	0.419	0.419	0.419	0.419

Total PTE of VOC (Breathing and Working Loss) (tons/year) = 1.68

Methodology

Equations for breathing loss and working loss are from Section 4.3 of Compilation of Air Pollution Emission Factors, AP-42 Fourth Edition, September 1985.

*True vapor pressure of creosote at bulk liquid conditions (72oF) equal to 6.0 kPa (0.87 psia, 45.0 mmHg)

**Appendix A: Emissions Calculations
Hazardous Air Pollutant (HAP) Emissions
Tanks 1-4**

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

HAP	CAS Number	% HAP in Creosote	PTE of HAPs (lbs/year)				Total PTE (lbs/year)	Total PTE (tons/year)
			Tank 1	Tank 2	Tank 3	Tank 4		
Acrolein	107-02-8	0.02%	0.17	0.17	0.17	0.17	0.67	0.00
Benzene	71-43-2	1.00%	8.39	8.39	8.39	8.39	33.55	0.02
o-Cresol	95-48-7	0.25%	2.10	2.10	2.10	2.10	8.39	0.00
m-Cresol	108-39-4	0.45%	3.77	3.77	3.77	3.77	15.10	0.01
p-Cresol	106-44-5	0.50%	4.19	4.19	4.19	4.19	16.77	0.01
Dibenzofuran	132-64-9	1.00%	8.39	8.39	8.39	8.39	33.55	0.02
Ethylbenzene	100-41-4	0.50%	4.19	4.19	4.19	4.19	16.77	0.01
Naphthalene	91-20-3	7.00%	58.71	58.71	58.71	58.71	234.83	0.12
Phenol	108-95-2	1.00%	8.39	8.39	8.39	8.39	33.55	0.02
Styrene	100-42-5	1.00%	8.39	8.39	8.39	8.39	33.55	0.02
Toluene	108-88-3	2.00%	16.77	16.77	16.77	16.77	67.10	0.03
Xylene	1330-20-7	4.00%	33.55	33.55	33.55	33.55	134.19	0.07
Totals							628.0	0.31

Methodology

PTE of HAPs (lbs/yr) = [Breathing and Working Loss (lbs/year)] * [% HAP in Creosote]
 Total PTE of HAPs (tons/yr) = [Total PTE of HAPs (lbs/year)] * [1 ton/2000 lbs]

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum round trip (feet/trip)	Maximum round trip (mi/trip)	Maximum round trip (miles/day)	Maximum round trip miles (miles/yr)
Vehicle (round trip)	N/A	N/A	11.0	40.0	438.0	1056	0.200	2.19	799.4
Total			11.0	40.0	438.0				799.4

Average Vehicle Weight Per Trip = $\frac{40.0}{1}$ tons/trip
Average Miles Per Trip = $\frac{0.20}{1}$ miles/trip

Unmitigated Emission Factor, Ef = $k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	40.0	40.0	5.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	8.28	2.11	0.08	lb/mile
Mitigated Emission Factor, Eext =	5.44	1.39	0.05	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (round trip)	3.31	0.84	0.03	2.18	0.55	0.02
	3.31	0.84	0.03	2.18	0.55	0.02

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

**Appendix A: Emission Calculations
VOC and HAP Emissions - Treated Storage Yard**

Company Name: Tangent Rail Products, Inc.
Source Address: 3818 S CR 50 E, Winslow, Indiana 47598
Permit No. 125-29288-00034
Reviewer: Marcia Earl
Date: June 2010

Emission Summary - Creosote

Pollutant	Total Emissions	Total Emissions	Total Emissions
	(lb/yr)	(ton/yr)	(lb/hr)
VOC	12043.59	6.02	1.37
HAP	5664.19	2.83	0.65
Naphthalene	5381.96	2.69	0.61
Quinoline	201.59	0.10	0.02
Biphenyl	74.94	0.04	0.01
Dibenzofuran	5.71	0.00	0.00

TIE STORAGE INFORMATION

Volume of Tie	3.72	ft ³
Number of Ties Treated per Month	127,728	ties
Rectangular Stacking Geometry		
Surface Area of One Tie Stack	590.00	ft ²
Total Yard Surface Area per Month	367,111	ft ²
Tram Bundle Stacking Geometry		
Surface Area of One Tram	244.27	ft ²
Trams		
Surface Area of One Tram	244.27	ft ²
Total Surface Area of Trams per Month	399,999	ft ²

Month	0-30 Day Old Ties	30-60 Day Old Ties	60-90 Day Old Ties	Total Ties in Storage
January	46,000	94,000	0	140,000
February	46,000	94,000	0	140,000
March	46,000	94,000	0	140,000
April	46,000	94,000	0	140,000
May	46,000	94,000	0	140,000
June	46,000	94,000	0	140,000
July	46,000	94,000	0	140,000
August	46,000	94,000	0	140,000
September	46,000	94,000	0	140,000
October	46,000	94,000	0	140,000
November	46,000	94,000	0	140,000
December	46,000	94,000	0	140,000

Monthly Naphthalene Emissions Calculations

Month	Surface Area of Trams	Surface Area of Ties	Naphthalene Emissions from Trams	Naphthalene Emissions from Ties	Temperature Correction Factor	Naphthalene Emissions from Tie and Tram Storage
			lb/month	lb/month		lb/month
January	399,999	438,432	353.53	912.76	0.11	136.33
February	399,999	438,432	353.53	912.76	0.12	153.25
March	399,999	438,432	353.53	912.76	0.18	231.24
April	399,999	438,432	353.53	912.76	0.28	359.04
May	399,999	438,432	353.53	912.76	0.42	536.85
June	399,999	438,432	353.53	912.76	0.60	760.03
July	399,999	438,432	353.53	912.76	0.69	874.16
August	399,999	438,432	353.53	912.76	0.66	840.06
September	399,999	438,432	353.53	912.76	0.51	646.24
October	399,999	438,432	353.53	912.76	0.32	408.34
November	399,999	438,432	353.53	912.76	0.21	264.35
December	399,999	438,432	353.53	912.76	0.14	172.06

Emissions Equation from Fugitive Emissions from Creosote Treated Wood Products Prepared for AWPI and Submitted to USEPA

Based on 6 poles with a 699 ft² surface area, assumes 30 days per month

$$\begin{aligned}
 N1(t) &= 1.370E-03 & * \exp & (& 0.46683 *t) & , t \leq 0.25 \text{ days} \\
 N2(t) &= 2.777E-03 & * \exp & (& -2.43497 *t) & , 0.25 < t \leq 1.0 \text{ days} \\
 N3(t) &= 2.533E-04 & * \exp & (& -0.04358 *t) & , t > 1.0 \text{ days}
 \end{aligned}$$

Calculated 24-hour Average California Pole Test Temperature = 80 °F
 Temperature Correction Factor for Other Geographic Locations = $\exp[-11,161.25*(1/T_oF+459.67)-1/(80+459.67)]$

Calculations submitted by Tangent Rail Products, Inc.



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

September 27, 2010

Mr. Steve Basham
Tangent Rail Products, Inc
3818 S CR 50 E
Winslow, IN 47598

Re: Public Notice
Tangent Rail Products, Inc
Permit Level: MSOP - Renewal
Permit Number: 125-29288-00034

Dear Mr. Basham,

Enclosed is a copy of your draft MSOP - Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Winslow Public Library, 105 Center St., in Winslow, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Press-Dispatch in Petersburg, IN publish this notice no later than September 29, 2010.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Marcia Earl, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0863 or dial (317) 233-0863.

Sincerely,

Michelle Denney
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 27, 2010

Press-Dispatch
820 Poplar St
P.O. Box 68
Petersburg, IN 47567

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Tangent Rail Products, Inc, Pike County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than September 29, 2010.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Michelle Denney at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Michelle Denney
Permit Branch
Office of Air Quality

cc: Tami DeMott: OAQ Billing, Licensing and Training Section
Permit Level: MSOP - Renewal
Permit Number: 125-29288-00034

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 27, 2010

To: Winslow Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Tangent Rail Products, Inc
Permit Number: 125-29288-00034

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels Jr.
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www.idem.IN.gov

Notice of Public Comment

September 27, 2010
Tangent Rail Products, Inc
125-29288-00034

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 2-8469 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	MIDENNEY 9/27/2010 Tangent Rail Products, Inc 125-29288-00034 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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		Steve Basham Tangent Rail Products, Inc 3818 S CR 50 E Winslow IN 47598 (Source CAATS)										
2		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
3		Mr. Paul Lake 2364 South CR 750 E. Winslow IN 47598 (Affected Party)										
4		Ms. Andrea Wood 4565 E CR 750 N Petersburg IN 47567 (Affected Party)										
5		Pike County Commissioners 801 Main Street Petersburg IN 47567 (Local Official)										
6		Pike County Health Department 801 Main St, Courthouse Petersburg IN 47567-1298 (Health Department)										
7		Mr. Meyer Larry 4715 S. CR 175 E. Winslow IN 47598 (Affected Party)										
8		Mr. Gary Leavitt 502 S. Lakeview Dr. Petersburg IN 47567 (Affected Party)										
9		Mr. Mack Overton Astbury Environmental Engineering 5757 W 74th St Indianapolis IN 46278 (Consultant)										
10		Winslow Branch Public Library 105 Center Street P O BOX 39 Winslow IN 47598 (Library)										
11		Tom & Sandy Loveless 138 Nichols Ave Petersburg IN 47567 (Affected Party)										
12		C.J. & Betty Meadors 5582 N CR 500 E Petersburg IN 47567 (Affected Party)										
13		Rachel Lewis 12710 N Green River Rd Evansville In 47725 (Affected Party)										
14		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
15												

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