INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 12, 2011

RE: Amsted Rail Company, Inc. / 089-30397-00204

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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

Enclosures
FNTV-PMOD.doc 3/27/08

IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Larry Moore
Amsted Rail Company, Inc.
4831 Hohman Avenue
Hammond, IN 46327-1579

August 12, 2011

Re: 089-30397-00204
Significant Permit Modification to
Part 70 Renewal No.: T 089-23826-00204

Dear Mr. Moore:

Amsted Rail Company, Inc. was issued a Part 70 Operating Permit Renewal on February 20, 2009 for a stationary steel coil spring manufacturing plant. A letter requesting changes to this permit was received on March 30, 2011. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of installation of one (1) medium line quench tank and one (1) draw furnace associated with the Medium Line Coil Spring Manufacturing Process, and two (2) shot peeners.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire Part 70 Operating Permit as modified will be provided at issuance. A copy of this permit is available on the Internet at: www.in.gov/ai/appfiles/idem-caats/.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Kimberly Cottrell, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Kimberly Cottrell or extension (3-0870), or dial (317) 233-0870.

Sincerely,

Tripurari P. Sinha, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments:
Updated Permit
Technical Support Document
PTE Calculations

klc

cc: File – Lake County
Lake County Health Department
U.S. EPA, Region V
Northwest Regional Office
Compliance and Enforcement Branch
Interested Parties

Mr. David Sutherland
Amsted Rail Company, Inc.
4831 Hohman Avenue
Hammond, IN 46327-1579

Mr. Tom Rarick
ERM
11350 North Meridian Street
Carmel, IN 46032

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(317) 232-8603
Toll Free (800) 451-6027
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Part 70 Operating Permit Renewal
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

Amsted Rail Company, Inc.
(formerly ASF-Keystone, Inc. - Hammond Plant)
4831 Hohman Avenue
Hammond, Indiana 46327

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 089-23826-00204	
Issued by: Original signed by: Tripurari Sinha, Ph.D., Section Chief Permits Branch, Office of Air Quality	Issuance Date: February 20, 2009
Issued by: Original signed by: Ronald L. Novak, Director Hammond Department of Environmental Management	Expiration Date: February 20, 2014

Administrative Amendment No.: T 089-27976-00204, issued on May 28, 2009.

Significant Permit Modification No.: 089-30397-00204	
Issued by/Original signed by: Tripurari Sinha Tripurari Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 12, 2011 Expiration Date: February 20, 2014

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permitted 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 Permitted 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary steel coil spring manufacturing plant.

Source Address:	4831 Hohman Avenue, Hammond, Indiana 46327
General Source Phone Number:	(219) 931-1900
SIC Code:	3493
County Location:	Lake
Source Location Status:	Nonattainment for $PM_{2.5}$ standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, under Nonattainment New Source Review for $PM_{2.5}$ Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Natural gas-fired boiler and furnaces, which include the following units:

Unit ID	Unit Description	Maximum Design Capacity *(MMBtu/hr heat input)*	Year Constructed
2-5027	Large Line Bar Furnace	20.5	1938
2-5075	Medium Line Bar Furnace	13.0	1956

(b) Coil Spring Grinders, which include the following:

Unit ID	Unit Description	Maximum Design Rate *(tons springs ground per hour)*
3-0386	#2 Beasley Ferris Wheel Grinder	1.11
3-0389	Gardner Tub Grinder	0.55
3-0385	#1 Beasley Ferris Wheel Grinder	1.55
3-0394	Beasley Swing Grinder	0.35
3-0249	Gardner Paddle Wheel Grinder	0.15
3-0247	Torrington Ferris Wheel Grinder	0.91
3-0244	#1 Mattson (Large) Grinder	2.15
3-0393	#2 Mattson (Small) Grinder	2.15
3-0396	Vertical Opposing Disc Grinder	1.11
3-0397	Vertical Opposing Disc Grinder	1.55

All the coil spring grinders above are controlled using a pulse-jet baghouse, identified as 3-3037, exhausting to Stack 3.

(c) Coil Spring Manufacturing Process Lines, which include the following:

(1) Small Line Coil Spring Manufacturing Process, with a maximum capacity of 3,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2821, constructed in 1973, using an electrostatic precipitator, identified as 3-3024, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 13. The process also includes a natural gas-fired draw furnace, identified as 2-5163, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(2) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2838A, permitted in 2011, using a fabric filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. The process also includes a natural gas-fired draw furnace, identified as 2-5097A, permitted in 2011, with a maximum design capacity of 5.0 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(3) Large Line Coil Spring Manufacturing Process, with a maximum capacity of 10,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2845, constructed in 1959, using an electrostatic precipitator, identified as 3-3036, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 15. The process also includes a natural gas-fired draw furnace, identified as 2-5164, with a maximum design capacity of 9.8 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(d) Paint Spray Booths, which include the following:

(1) Paint Spray Booth, identified as 3-2715, using dry filters - double wall as PM control, constructed in 1989**.**

(2) Paint Spray Booth, identified as 3-2714, using dry filters - double wallas PM control, constructed in 1980**.**

(e) Coil Spring Coating Dip Tanks, for application of rust preventative coatings, which include the following:

Unit ID	Coating
3-2813	Water-based Clear Coating
3-2865	Water-based Clear Coating
3-2865A	Water-based Clear Coating
3-2867	Water-based Clear Coating
3-2870	Water-based Clear Coating
3-2869	Solvent-based or Water-based Clear Coating
3-2872	Solvent-based or Water-based Clear Coating
3-2873	Solvent-based or Water-based Clear Coating

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

(a) Space heaters, process heaters, heat treat furnaces or boilers using natural gas-fired combustion sources, regulated by 326 IAC 6.8-2-4(b), with heat input equal to or less than ten million (10,000,000) British thermal units per hour, which include the following units:

Unit ID	Unit Description	Maximum Design Capacity *(MMBtu/hr heat input)*
2-5085	Small Line Bar Furnace	8.0
2-5006	Small Line Slot Furnace	1.5
2-5014	Medium Line Slot Furnace	5.2 *(for Units 2-5014 and 2-5015 combined)*
2-5015	Medium Line Slot Furnace	
2-5036	Large Line Slot Furnace	2.5
2-5163	Small Line Draw Furnace	5.1
2-5097	Medium Line Draw Furnace	5.1
2-5164	Large Line Draw Furnace	9.8

(b) Shot Peeners, regulated by 326 IAC 6.8-2-4(a), which include the following units:

(1) Pangborn Shot Peener, identified as 3-1804, with a maximum capacity of 0.012 tons steel shots used per hour, using a baghouse, identified as 3-3017, as control, constructed in 1964, and exhausting to Stack 9.

(2) Wheelabrator Shot Peener, identified as 3-1821, with a maximum capacity of 0.12 tons steel shots used per hour, using a baghouse, identified as 3-3022, as control, constructed in 1972, and exhausting to Stack 11.

(3) Wheelabrator Shot Peener, identified as 3-1823, with a maximum capacity of 0.21 tons steel shots used per hour, using a baghouse, identified as 3-1823, as control, constructed in 1980, and exhausting to Stack 12.

(4) One (1) Shot Peener, identified as 3-1824, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3024, for control of particulate matter emissions, and exhausting to Stack 24.

(5) One (1) Shot Peener, identified as 3-1825, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3025, for control of particulate matter emissions, and exhausting to Stack 25.

(c) Two (2) Cold Cleaner Degreasers, solvent not remotely stored. [326 IAC 8-3]

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8]

(f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations. [326 IAC 6.5-1-2]

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment [326 IAC 2-7-1(21)(G)(X)(AA)].

(h) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity of less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment. [326 IAC 2-7-1(21)(G)(ii)(AA)].

(i) A petroleum fuel or other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. [326 IAC 2-7-1(21)(G)(ii)(BB)].

(j) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coatings.

(k) Routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines and purging of vessels.
[326 IAC 2-7-1(21)(G)(xvii)].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) The Part 70 Operating Permit Renewal, T089-23826-00204, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM-OAQ 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM-OAQ within a reasonable time, any information that IDEM-OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM-OAQ copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(c) The annual compliance certification report shall include the following:

(1) Identification of whether compliance during the period was continuous or intermittent;

(2) In cases where there was not continuous compliance with all permit terms and conditions, the identification of the permit term(s) or condition(s) for which compliance was intermittent;

(3) The identification of the method(s) or other means used by the owner or operator for determining the compliance status; and

(4) Such other facts, as specified in Sections D of this permit, as IDEM,OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM-OAQ and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM-OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM-OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM-OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM-OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM-OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T089-23826-00204 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 RESERVED

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM-OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM-OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM-OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM-OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(40) and 326 IAC 2-7-1(21). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 2-7-4(a)(2)(D), in writing by IDEM-OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM-OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM-OAQ or U.S. EPA is required.

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

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM-OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM-OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e),failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 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.3 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.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6.8-10-3]

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

(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan.

C.6 Lake County: Particulate Matter Contingency Measures [326 IAC 6.8-11]

The Permittee shall comply with the applicable provisions of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures).

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-6(1)]

C.9 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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM-OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM-OAQ no 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.10 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.12 Lake County: Continuous Compliance Plan [326 IAC 6.8-8]

Pursuant to 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan), the Permittee shall submit to IDEM-OAQ and maintain at the source a copy of the Continuous Compliance Plan. The Permittee shall perform the inspections, monitoring, and record keeping requirements as specified in 326 IAC 6.8-8-7. The Permittee shall update the CCP, as needed, retain a copy on site, and make the updated CCP available for inspection as specified in 326 IAC 6.8-8-8.

C.13 RESERVED

C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM-OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.17 Response to Excursions or Exceedances[326 IAC 2-7-5] [326 IAC 2-7-6]

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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(b) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purposes of Part 70 fee assessment.

This statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ on or before the date it is due.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Natural gas-fired boiler and furnaces, which include the following:

Unit ID	Unit Description	Maximum Design Capacity *(MMBtu/hr heat input)*	Year Constructed
2-5027	Large Line Bar Furnace	20.5	1938
2-5075	Medium Line Bar Furnace	13.0	1956

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter less than 10 microns in diameter (PM_{10})[326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(b) (Lake County: PM_{10} Emission Requirements), Large Line Bar Furnace (Unit ID 2-5027), and Medium Line Bar Furnace (Unit ID 2-5075) shall fire natural gas only.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Coil Spring Grinders, which include the following:

Unit ID	Unit Description	Maximum Design Rate *(tons springs ground per hour)*
3-0386	#2 Besley Ferris Wheel Grinder	1.11
3-0389	Gardner Tub Grinder	0.55
3-0385	#1 Besley Ferris Wheel Grinder	1.55
3-0394	Besley Swing Grinder	0.35
3-0249	Gardner Paddle Wheel Grinder	0.15
3-0247	Torrington Ferris Wheel Grinder	0.91
3-0244	#1 Mattison (Large) Grinder	2.15
3-0393	#2 Mattison (Small) Grinder	2.15
3-0396	Vertical Opposing Disc Grinder	1.11
3-0397	Vertical Opposing Disc Grinder	1.55

All the coil spring grinders above are controlled using a pulse-jet baghouse, identified as 3-3037, exhausting to Stack 3.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitations for Lake County [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2, particulate matter emissions from the stack of the baghouse controlling emissions from the Vertical Opposing Disc Grinders 3-0396 and 3-0397 shall not exceed 0.03 grain per dry standard cubic foot (dscf).

D.2.2 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2-4]

Pursuant to 326 IAC 6.8-2-4(a) (Lake County PM_{10} Emission Requirements), emissions of particulate matter less than ten microns in diameter (PM_{10}) from the following coil spring grinders shall be limited to the following:

Unit ID	**Emission Limit** *(lb/hr)*
Stack serving the following spring grinders: 3-0244, 3-0247, 3-0249, 3-0385, 3-0386, 3-0389, 3-0393, and 3-0394	2.085

D.2.3 PSD Minor Limits [326 IAC 2-2]

PM and PM_{10} emissions shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM_{10} Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99	2.085
Torrington Ferris Wheel Grinder	3-0247		
Gardner Paddle Wheel Grinder	3-0249		
#1 Besley Ferris Wheel Grinder	3-0385		
#2 Besley Ferris Wheel Grinder	3-0386		
Gardner Tub Grinder	3-0389		
#2 Mattison (Small) Grinder	3-0393		
Besley Swing Grinder	3-0394		
Vertical Opposing Disc Grinder	3-0396		1.89
Vertical Opposing Disc Grinder	3-0397		2.64

Compliance with these emission limits combined with the limits in Conditions D.3.4 and D.7.3, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

D.2.4 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5]

$PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	$PM_{2.5}$ Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99
Torrington Ferris Wheel Grinder	3-0247	
Gardner Paddle Wheel Grinder	3-0249	
#1 Besley Ferris Wheel Grinder	3-0385	
#2 Besley Ferris Wheel Grinder	3-0386	
Gardner Tub Grinder	3-0389	
#2 Mattison (Small) Grinder	3-0393	
Besley Swing Grinder	3-0394	
Vertical Opposing Disc Grinder	3-0396	
Vertical Opposing Disc Grinder	3-0397	

Compliance with these emission limits combined with the limits in Conditions D.3.5 and D.7.4, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for these facilities and the associated baghouse. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.6 Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]

(a) Pursuant to 326 IAC 2-7-6 and in order to comply with Conditions D.2.1, D.2.2, D.2.3, and D.2.4, the baghouse for PM, PM_{10}, and $PM_{2.5}$ control shall be in operation and control emissions at all times when any of the grinders is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM-OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.7 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing of the baghouse controlling the grinders. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition. PM_{10} and $PM_{2.5}$ include filterable and condensable PM. A demonstration of compliance with the PM_{10} limits in D.2.2 may be used to demonstrate compliance with the PM limit in D.2.1.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.2.8 Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhausts shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

D.2.9 Parametric Monitoring (Dust Collector)

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the coil spring grinders at least once per day when any of the coil spring grinders is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

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

D.2.10 Broken or Failed Bag Detection

(a) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM-OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.8, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document compliance with Condition D.2.9(a), the Permittee shall maintain a daily record of the pressure drop reading across the baghouse controlling the processes. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) To document compliance with Condition D.2.9(b), the Permittee shall maintain records of calibrations of the instrument used for determining the pressure drop across the baghouse.

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Coil Spring Manufacturing Process Lines, which include the following:

(1) Small Line Coil Spring Manufacturing Process, with a maximum capacity of 3,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2821, constructed in 1973, using an electrostatic precipitator, identified as 3-3024, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 13. The process also includes a natural gas-fired draw furnace, identified as 2-5163, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(2) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2838A, permitted in 2011, using a fabric filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. The process also includes a natural gas-fired draw furnace, identified as 2-5097A, permitted in 2011, with a maximum design capacity of 5.0 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(3) Large Line Coil Spring Manufacturing Process, with a maximum capacity of 10,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2845, constructed in 1959, using an electrostatic precipitator, identified as 3-3036, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 15. The process also includes a natural gas-fired draw furnace, identified as 2-5164, with a maximum design capacity of 9.8 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(a) (Lake County: PM_{10} Emission Requirements) emissions of particulate matter less than ten microns in diameter (PM_{10}) from these units shall be limited to:

Unit ID	Emission Limit *(lb/hr)*
Small Line Coil Spring Manufacturing Process (ESP 3-3024)	1.05
Large Line Coil Spring Manufacturing Process (ESP 3-3028)	1.75

D.3.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County) emissions of particulate matter (PM) less from the oil quench tank (3-2838A) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.3.3 VOC BACT Minor Limit [326 IAC 8-1-6]

The uncontrolled VOC emissions from this Medium Quench Tank (3-2838A) shall be limited to less than 25 tons per twelve consecutive month period, with compliance determined each month.

This limit shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) are not applicable to the medium line quench tank (3-2838A).

D.3.4 PSD Minor Limits [326 IAC 2-2]

PM and PM_{10} emissions shall be limited to:

Emission Unit	ID	**PM Limit** (lb/hr)	**PM_{10} Limit** (lb/hr)
Medium Line Quench Tank	3-2838A	2.97	2.97
Small Line Quench Tank	3-2821	2.97	1.05
Large Line Quench Tank	3-2845	2.97	1.75

Compliance with these emission limits combined with the limits in Conditions D.2.3 and D.7.3, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

D.3.5 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5]

$PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	**$PM_{2.5}$ Limit** (lb/hr)
Medium Line Quench Tank	3-2838A	2.97
Small Line Quench Tank	3-2821	1.05
Large Line Quench Tank	3-2845	1.75

Compliance with these emission limits combined with the limits in Conditions D.2.4 and D.7.4, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for these facilities and their associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.3.7 Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5] [40 CFR 64]

(a) Pursuant to 326 IAC 2-7-6 and in order to comply with Conditions D.3.1, D.3.4, and D.3.5, the electrostatic precipitators for PM, PM_{10}, and $PM_{2.5}$, control shall be in operation and control emissions at all times when the associated Small Line Coil Spring Manufacturing Process or Large Line Coil Spring Manufacturing Process is in operation.

(b) Pursuant to 326 IAC 2-7-6 and in order to comply with Conditions D.3.2, D.3.4, and D.3.5, the baghouse for PM, PM_{10}, $PM_{2.5}$, and VOC control shall be in operation and control emissions at all times when the associated Medium Line Coil Spring Manufacturing Process is in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM-OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.3.8 Testing Requirements [326 IAC 2-1.1-11] [40 CFR 64]

(a) In order to demonstrate compliance with Conditions D.3.2, D.3.4, and D.3.5, the Permittee shall perform PM, PM_{10}, $PM_{2.5}$, and VOC testing of the baghouse controlling the oil quench tank (3-2838A) associated with the Medium Line Coil Spring Manufacturing Process within one hundred eighty (180) days of operation of the Medium Line Coil Spring Manufacturing Process. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate compliance with Conditions D.3.1, D.3.4 and D.3.5, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$, testing of the electrostatic precipitator controlling the oil quench tank (3-2821) associated with the Small Line Coil Spring Manufacturing Process, and the electrostatic precipitator controlling the oil quench tank (3-2845) associated with the Large Line Coil Spring Manufacturing Process within one hundred eighty (180) days of issuance of SSM No. 089-30392-00204. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(c) In order to demonstrate compliance with Condition D.3.3, the Permittee shall perform testing of uncontrolled VOC (point source and fugitive) emissions from the medium line quench tank (3-2838A) within one hundred eighty (180) days of issuance of SSM No. 089-30392-00204.

PM, PM_{10}, $PM_{2.5}$, and VOC testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

D.3.9 Volatile Organic Compounds (VOC)

Compliance with Condition D.3.3 shall be determined using the following equation:

$$E = \frac{T \times EF}{2000 lb / ton}$$

where:
E = Uncontrolled VOC emissions in tons/month
T = Process Throughput in tons/month
EF = Uncontrolled VOC (point source and fugitives) emission factor in lb VOC /ton steel, as determined by a valid compliance demonstration

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)] [40 CFR 64]

D.3.10 Visible Emissions Notations [40 CFR 64]

(a) Visible Emissions Notations:

(1) Visible emission notations of the electrostatic precipitator stack exhaust for the Large Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

(2) Visible emission notations of the baghouse stack exhaust for the Medium Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

(3) Visible emission notations of the electrostatic precipitator stack exhaust for the Small Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

D.3.11 Parametric Monitoring(Baghouse) [40 CFR 64]

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Medium Line Coil Spring Manufacturing Process at least once per day when the Medium Line Coil Spring Manufacturing Process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 64]

D.3.12 Record Keeping Requirements [40 CFR 64]

(a) To document compliance with Conditions D.3.3 and D.3.9, the Permittee shall maintain records of the monthly VOC emissions (tons) and the monthly process throughput (tons) for the medium line quench tank (3-2838A).

(b) To document compliance with Condition D.3.10, the Permittee shall maintain daily records of visible emission notations of the Large Line Coil Spring Manufacturing Process and Small Line Coil Spring Manufacturing Process electrostatic precipitator stack exhausts and the Medium Line Coil Spring Manufacturing Process baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) To document compliance with Condition D.3.11, the Permittee shall maintain a daily record of the pressure drop reading across the baghouse controlling the process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.3.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.3.3 (uncontrolled fugitive VOC emissions and controlled VOC emissions from the medium line quench tank (3-2838A)), and D.3.9, shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days following the end of each quarter. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Paint Spray Booths, which include the following:

(1) Paint Spray Booth, identified as 3-2715, using dry filters - double wall as PM control, constructed in 1989.

(2) Paint Spray Booth, identified as 3-2714, using dry filters - double wall as PM control, constructed in 1980.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied at each of the two (2) paint spray booths, identified as 3-2715 and 3-2714, shall be limited to 2.8 pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day, for air-dried/general, one component coatings.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. The volume weighted average shall be determined by the following equation:

$$A = [\sum(C \times U) / \sum U]$$

Where:
A = volume weighted average in pounds VOC per gallon less water, as applied
C = VOC content of the coating in pounds VOC per gallon less water, as applied; and
U = usage rate of the coating in gallons per day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for these facilities and their dry filters. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2]

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer copies of the "as supplied" and "as applied" VOC data sheets. IDEM-OAQ reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.4 Particulate Matter (PM) [326 IAC 2-7-6]

Pursuant to 326 IAC 2-7-6, the dry filters for PM control shall be in operation at all times when the associated paint spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.4.5 Monitoring Requirements

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations of overspray from each paint booth shall be made while the booth is in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step.

(b) Monthly inspections shall be performed of coating emissions from the stack of paint spray booth, identified as 3-2714, by ground-level examination and the presence of overspray on the nearby ground of both paint spray booths, identified as 3-2715 and 3-2714. The Response to Excursions or Exceedances for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step.

(c) Failure to take response steps shall be considered a deviation of this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.6 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records of the following:

(1) The dates of operation, per paint spray booth.

(2) The quantity and VOC content of each coating less water and solvent used per day of operation, per paint spray booth.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings less water as applied per day of operation, per paint spray booth.

(b) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily inspections of the dry filters, weekly paint booth overspray observations, and monthly inspections of nearby ground for presence of overspray.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Coil Spring Coating Dip Tanks, for application of rust preventative coatings, which include the following:

Unit ID	Coating
3-2813	Water-based Clear Coating
3-2865	Water-based Clear Coating
3-2865A	Water-based Clear Coating
3-2867	Water-based Clear Coating
3-2870	Water-based Clear Coating
3-2869	Solvent-based or Water-based Clear Coating
3-2872	Solvent-based or Water-based Clear Coating
3-2873	Solvent-based or Water-based Clear Coating

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of clear coating applied at each of the coating dip tanks shall be limited to 2.8 pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day, for air-dried/general, one component coatings.

(b) Compliance with the VOC content limits in Permit Conditions D.5.1(a) and (b) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. The volume-weighted average shall be determined by the following equation:

$$A = [\sum(C \times U) / \sum U]$$

Where:
A = volume weighted average in pounds VOC per gallon less water, as applied
C = VOC content of the coating in pounds VOC per gallon less water, as applied; and
U = usage rate of the coating in gallons per day.

D.5.2 PSD Minor Limit [326 IAC 2-2]

VOC emissions shall be limited to:

Emission Unit	**ID**	**VOC Limit** (ton/yr)
Dip Coating	3-2813	74.81
Dip Coating	3-2865	
Dip Coating	3-2865A	
Dip Coating	3-2867	
Dip Coating	3-2870	
Dip Coating	3-2869	55.19
Dip Coating	3-2872	
Dip Coating	3-2873	

Compliance with these emission limits combined with the limit in Condition D.3.3, and the potential to emit VOC emissions from all other equipment at this source will limit the potential to emit of VOC from the entire source to less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for VOC.

Compliance Determination Requirements

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2]

Compliance with the VOC content and usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of "as supplied" and "as applied" VOC data sheets. IDEM-OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.4 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain monthly records of the following for compliant coatings:

(1) The dates of operation during each month, per coating type.

(2) The quantity and VOC content of each coating less water and solvent used each month, per coating type (e.g., water-based clear coatings, solvent-based clear coatings, or other coatings).

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted average VOC content of the coatings less water as applied per day of operation, per coating type (e.g., water-based clear coatings, solvent-based clear coatings, or other coatings).

(4) In the event solvent is added to a compliant coating by the Permittee, the Permittee shall maintain daily records of the information required in Condition D.5.3(a)(1)-(3) for the coating and solvent added.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Natural gas-fired furnaces, which include the following:

Unit ID	Unit Description	Maximum Design Capacity *(MMBtu/hr heat input)*
2-5085	Small Line Bar Furnace	8.0
2-5006	Small Line Slot Furnace	1.5
2-5014	Medium Line Slot Furnace	5.2 *(for Units 2-5014 and 2-5015 combined)*
2-5015	Medium Line Slot Furnace	
2-5036	Large Line Slot Furnace	2.5
2-5163	Small Line Draw Furnace	5.1
2-5097A	Medium Line Draw Furnace	5.0
2-5164	Large Line Draw Furnace	9.8

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(b) (Lake County: PM_{10} and total suspended particulates (TSP) emissions), the Small Line Bar Furnace (2-5085), Small Line Slot Furnace (2-5006), Medium Line Slot Furnaces (2-5014 and 2-5015), Large Line Slot Furnace (2-5036), Small Line Draw Furnace (2-5163), and Large Line Draw Furnace (2-5164) shall fire natural gas only.

D.6.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County) emissions of particulate matter (PM) from the Medium Line Draw Furnace (2-5097A), shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) Shot Peeners, regulated by 326 IAC 6.8-2-4(a), which include the following units:

(1) Pangborn Shot Peener, identified as 3-1804, with a maximum capacity of 0.012 tons steel shots used per hour, using a baghouse, identified as 3-3017, as control, constructed in 1964, and exhausting to Stack 9.

(2) Wheelabrator Shot Peener, identified as 3-1821, with a maximum capacity of 0.12 tons steel shots used per hour, using a baghouse, identified as 3-3022, as control, constructed in 1972, and exhausting to Stack 11.

(3) Wheelabrator Shot Peener, identified as 3-1823, with a maximum capacity of 0.21 tons steel shots used per hour, using a baghouse, identified as 3-1823, as control, constructed in 1980, and exhausting to Stack 12.

(4) One (1) Shot Peener, identified as 3-1824, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3024, for control of particulate matter emissions, and exhausting to Stack 24.

(5) One (1) Shot Peener, identified as 3-1825, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3025, for control of particulate matter emissions, and exhausting to Stack 25.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(a) (Lake County: PM_{10} Emission Requirements) emissions of particulate matter less than ten microns in diameter (PM_{10}) from these units shall be limited to:

Facility	Emission Limit *(lb/ton)*	Emission Limit *(lb/hr)*
Pangborn Shot Peener (3-1804)	0.011	0.06
Wheelabrator Shot Peener (3-1821)	0.016	0.06
Wheelabrator Shot Peener (3-1823)	0.016	0.06

D.7.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County) emissions of particulate matter (PM) from Shot Peener (3-1824) and Shot Peener (3-1825) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.7.3 PSD Minor Limits [326 IAC 2-2]

PM and PM_{10} emissions shall be limited to:

Emission Unit	ID	**PM Limit** (lb/hr)	**PM_{10} Limit** (lb/hr)
Shot Peener	3-1824	0.99	0.99
Shot Peener	3-1825	0.99	0.99
Shot Peener	3-1804	0.99	0.06
Shot Peener	3-1821	0.99	0.06

Shot Peener	3-1823	0.99	0.06

Compliance with these emission limits combined with the limits in Conditions D.2.3 and D.3.4, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

D.7.4 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5]

$PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	**$PM_{2.5}$ Limit** (lb/hr)
Shot Peener	3-1824	0.99
Shot Peener	3-1825	0.99
Shot Peener	3-1804	0.06
Shot Peener	3-1821	0.06
Shot Peener	3-1823	0.06

Compliance with these emission limits combined with the limits in Conditions D.2.4 and D.3.5, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP) is required for these facilities and their associated baghouses. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.7.6 Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]

(a) In order to comply with Conditions D.7.1, D.7.2, D.7.3, and D.7.4, the bag filter dust collectors for PM, PM_{10}, and $PM_{2.5}$ control shall be in operation and control emissions from their associated facilities at all times that the facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM-OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.7.7 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.7.2, D.7.3, and D.7.4, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on one of the baghouses controlling Shot Peener (3-1824) and Shot Peener (3-1825) within one hundred eighty (180) days of operation of each Shot Peener. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate compliance with Conditions D.7.1, D.7.3 and D.7.4, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on one of the baghouses controlling Shot Peener (3-3017), Shot Peener (3-3022), or Shot Peener (3-1823) within one hundred eighty (180) days of issuance of SSM No. 089-30392-00204. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years on alternate baghouses from the date of this valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.7.8 Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhausts for Shot Peener (3-1824) and Shot Peener (3-1825) shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

D.7.9 Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with Shot Peener (3-1824) and Shot Peener (3-1825) at least once per day when any of Shot Peeners are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.10 Record Keeping Requirements

(a) To document compliance with Condition D.7.8, the Permittee shall maintain daily records of visible emission notations of the Shot Peener (3-1824) and Shot Peener (3-1825) baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document compliance with Condition D.7.9, the Permittee shall maintain a daily record of the pressure drop reading across the baghouses controlling Shot Peener (3-1824) and Shot Peener (3-1825). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.8 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) Cold Cleaner Degreasers, solvent not remotely stored.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compounds (VOC) [326 IAC 8-3]

(a) Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), users of solvents for use in cold cleaner degreaser operations located in Clark, Floyd, Lake, and Porter Counties shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight degrees Fahrenheit (68 °F)).

(b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9 °C) (one hundred twenty degrees Fahrenheit (120 °F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(d) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.8.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8] [326 IAC 8-3-5]

(a) Compliance with the solvent vapor pressure limitations contained in Condition D.8.1(a) shall be determined pursuant to 326 IAC 8-1-4(h) or obtaining from the manufacturer copies of the Material Safety Data Sheets (MSDS).

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning shall close the degreaser covers whenever articles are not being handled in the degreasers.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
Part 70 Permit No.: T089-23826-00204

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify): _____

☐ Report (specify): _____

☐ Notification (specify): _____

☐ Affidavit (specify): _____

☐ Other (specify): _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

100 North Senate Avenue
MC 61-53, IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
Part 70 Permit No.: T089-23826-00204

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance and Enforcement Branch); and
- The Permittee must submit notice in writing or by facsimile no later than two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency
Describe the cause of the Emergency

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? ☐ Y ☐ N Describe: Type of Pollutants Emitted: ☐ TSP ☐ PM-10 ☐ SO_2 ☐ VOC ☐ NO_X ☐ CO ☐ Pb ☐ other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
Part 70 Permit No.: T089-23826-00204
Facility: Medium Line Quench Tank (3-2838A)
Parameter: Uncontrolled (fugitive and point source) VOC Emissions
Limit: Not to exceed 13.02 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	VOC Emissions for This Month (tons)	VOC Emissions for Previous 11 Months (tons)	VOC Emissions for 12-Month Period (tons)

☐ No deviation occurred in this quarter.

☐ Deviations occurred in this quarter.
Deviation has been reported on: _____

Submitted By: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
Part 70 Permit No.: T089-23826-00204

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (TSD)
for a Part 70 Significant Source Modification and
a Part 70 Significant Permit Modification

Source Description and Location

Source Name:	Amsted Rail Company, Inc.
Source Location:	4831 Hohman Avenue, Hammond, IN 46327
County:	Lake
SIC Code:	3493
Operation Permit Renewal No.:	T 089-23826-00204
Operation Permit Renewal Issuance Date:	February 20, 2009
Significant Source Modification No.:	089-30392-00204
Significant Permit Modification No.:	089-30397-00204
Permit Reviewer:	Kimberly Cottrell

Public Notice Information

On June 18, 2011, the Office of Air Quality (OAQ) had a notice published in Post Tribune in Merrillville, Indiana, and The Times in Munster, Indiana, stating that the Amsted Rail Company, Inc. had applied for a significant modification to their Part 70 Operating Permit Renewal issued on February 20, 2009to install one (1) quench tank, one (1) draw furnace, and two (2) shot peeners. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

General Comments and IDEM's Responses

On July 5, 2011, OAQ received comments from Debra Malone of the Hammond Department of Environmental Management (HDEM). The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

Comment 1: The Table of Contents should be updated as follows:

B.21 Source Modification Requirement [326 IAC 2-7-10.5] **[326 IAC 2-2-2] [326 IAC 2-3-2]**

IDEM Response:

The source modification requirements under 326 IAC 2-7-10.5 cover modifications pursuant to 326 IAC 2-2-2 and 326 IAC 2-3-2. IDEM has corrected Condition B.21 as follows:

B.21 Source Modification Requirement [326 IAC 2-7-10.5] ~~[326 IAC 2-2-2] [326 IAC 2-3-2]~~

~~(a)~~ A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2~~ and 326 IAC 2-7-10.5~~.

~~(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3.~~

Comment 2: The words "Specifically Regulated" are missing from the Title of Condition A.3. The Title should read as follows:

A.3 **Specifically Regulated** Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

IDEM Response:

IDEM has made this change.

Comment 3: The word "Renewal" is missing from Condition B.2. The condition should read as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) The Part 70 Operating Permit **Renewal**, T089-23826-00204, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) ...

IDEM Response:

IDEM has made this change.

Comment 4: The word "of" is shown as struck out in Condition C.21, and should be removed as intended. The condition should read as follows:

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) ... This report shall be submitted not later than thirty (30) days ~~of~~ after the end of the reporting period. ...

IDEM Response:

IDEM has made this change.

Comment 5: Condition C.22 should end with a period, not a colon. The condition should read as follows:

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

... for recycling and emissions reduction~~:~~**.**

IDEM Response:

IDEM has made this change.

Comment 6: Condition D.2.3 should be corrected to state the correct PM_{10} emission limit for the first eight grinders, as stated in Condition D.2.2 and the emission calculations (TSD Appendix A). Also, the condition reference should be removed as intended. The condition references for the other PM and PM_{10} limits should be Conditions D.3.4 and D.7.3. Condition D.2.3 should read as follows:

D.2.3 PSD Minor Limits [326 IAC 2-2]

PM and PM_{10} emissions shall be limited to:

Emission Unit	**ID**	**PM Limit** (lb/hr)	**PM_{10} Limit** (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99	~~0.99~~ **2.085**
Torrington Ferris Wheel Grinder	3-0247		
Gardner Paddle Wheel Grinder	3-0249		
#1 Besley Ferris Wheel Grinder	3-0385		
#2 Besley Ferris Wheel Grinder	3-0386		
Gardner Tub Grinder	3-0389		
#2 Mattison (Small) Grinder	3-0393		
Besley Swing Grinder	3-0394		
Vertical Opposing Disc Grinder	3-0396		1.89
Vertical Opposing Disc Grinder	3-0397		2.64

Compliance with these emission limits combined with the limits in Conditions ~~D.3.5~~ **D.3.4** and D.7.3, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

IDEM Response:

IDEM has made this change.

Comment 7: The condition references for the other $PM_{2.5}$ limits (Condition D.2.4) should be Conditions D.3.5 and D.7.4. Condition D.2.4 should read as follows:

Compliance with these emission limits combined with the limits in Conditions ~~D.3.6~~ **D.3.5** and D.7.4, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

IDEM Response:

IDEM has made this change.

Comment 8: The condition reference for the VOC limits (Condition D.5.2) should be Conditions D.3.3. Condition D.5.2 should read as follows:

Compliance with these emission limits combined with the limit in Condition ~~D.3.4~~ **D.3.3**, and the potential to emit VOC emissions from all other equipment at this source will limit the potential to emit of VOC from the entire source to less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for VOC.

IDEM Response:

IDEM has made this change.

Comment 9: The condition references for the other PM and PM_{10} limits (Condition D.7.3) should be Conditions D.2.3 and D.3.4. Condition D.7.3 should read as follows:

Compliance with these emission limits combined with the limits in Conditions D.2.3 and ~~D.3.5~~ **D.3.4**, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

IDEM Response:

IDEM has made this change.

Comment 10: The condition references for the other $PM_{2.5}$ limits (Condition D.7.4) should be Conditions D.2.4 and D.3.5. Condition should read as follows:

Compliance with these emission limits combined with the limits in Conditions D.2.4 and ~~D.3.6~~ **D.3.5**, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

IDEM Response:

IDEM has made this change.

Comment 11: The word "working" should be included in the second statement on the Emergency Occurrence Report as follows:

The Permittee must submit notice in writing or by facsimile no later than two (**2**) **working** days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

IDEM Response:

IDEM has made this change.

Other Changes

Upon further review, the OAQ has decided to make the following revisions to the permit:

Change No. 1: The title of Condition D.3.5 is revised as follows:

D.3.5 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5] ~~[40 CFR 64]~~

Change No. 2: Visible Emissions Notations for the Small Line Coil Spring Manufacturing Process were inadvertently omitted from the permit. Conditions D.3.10(a) and D.3.12(b) are revised as follows:

D.3.10 Visible Emissions Notations [40 CFR 64]

(a) Visible Emissions Notations:

(1) Visible emission notations of the electrostatic precipitator stack exhaust for the Large Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

(2) Visible emission notations of the baghouse stack exhaust for the Medium Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

(3) Visible emission notations of the electrostatic precipitator stack exhaust for the Small Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

A trained employee shall record whether emissions are normal or abnormal.

(b) - (e) ...

D.3.12 Record Keeping Requirements [40 CFR 64]

(a) ...

(b) To document compliance with Condition D.3.10, the Permittee shall maintain daily records of visible emission notations of the Large Line Coil Spring Manufacturing Process **and Small Line Coil Spring Manufacturing Process** electrostatic precipitator stack ~~exhaust~~ **exhausts** and the Medium Line Coil Spring Manufacturing Process baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

Change No. 3: The words "any of" are removed from Condition D.3.11(a) as follows:

D.3.11 Parametric Monitoring(Baghouse) [40 CFR 64]

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Medium Line Coil Spring Manufacturing Process at least once per day when ~~any of~~ the Medium Line Coil Spring Manufacturing Process is in operation. ...

(b) ...

Change No. 4: Condition D.3.12(c) is updated as follows to change the word "processes" to "process":

D.3.12 Record Keeping Requirements [40 CFR 64]

(a) - (b) ...

(c) To document compliance with Condition D.3.11, the Permittee shall maintain a daily record of the pressure drop reading across the baghouse controlling the ~~processes~~ **process**. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) ...

Change No. 5: Condition D.7.11 is removed in its entirety as the referenced condition does not require quarterly reporting and there are no other emission limitations in Section D.7 that would necessitate quarterly reporting.

~~D.7.11 Reporting Requirements~~

~~A quarterly summary of the information to document the compliance status with Condition D.7.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days following the end of each quarter. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.~~

IDEM Contact

Questions regarding this proposed permit can be directed to:

Kimberly Cottrell
Indiana Department Environmental Management
Office of Air Quality
100 North Senate Avenue
MC 61-53, Room 1003
Indianapolis, Indiana 46204-2251
Toll free (within Indiana): 1-800-451-6027 extension 3-0870
Or dial directly: (317) 233-0870
kcottrel@idem.in.gov

Please refer to Significant Source Modification No. 089-30392-00204 and Significant Permit Modification No. 089-30397-00204 in all correspondence.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Part 70 Significant Source Modification and
a Part 70 Significant Permit Modification

Source Description and Location

Source Name:	Amsted Rail Company, Inc.
Source Location:	4831 Hohman Avenue, Hammond, IN 46327
County:	Lake
SIC Code:	3493
Operation Permit Renewal No.:	T 089-23826-00204
Operation Permit Renewal Issuance Date:	February 20, 2009
Significant Source Modification No.:	089-30392-00204
Significant Permit Modification No.:	089-30397-00204
Permit Reviewer:	Kimberly Cottrell

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T 089-23826-00204 on February 20, 2009. The source has since received the following approvals:

Administrative Amendment No. 089-27976-00204, issued on May 28, 2009; and

County Attainment Status

The source is located in Lake County.

Table 1: County Attainment Status

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O_3	Attainment effective May 11, 2010, for the 8-hour ozone standard.[1]
PM_{10}	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3.
Basic nonattainment designation effective federally 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. Lake 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) $PM_{2.5}$
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for $PM_{2.5}$. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for $PM_{2.5}$ promulgated on May 8th, 2008, and effective on July 15th 2008. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Lake County has been classified as attainment or unclassifiable for PM_{10}, SO_2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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.

Source Status

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

Table 2: Source Status PTE

Pollutant	**Emissions** (ton/yr)
CO	25.58
NO_X	39.07
PM	9.25
PM_{10}	9.10
$PM_{2.5}$	9.10
SO_2	0.21
VOC	202.14
Single HAP	<10
Total HAP	<25

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) This existing source is not a major stationary source under Nonattainment New Source Review rules (326 IAC 2-1.1-5) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

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

(d) These emissions are based upon Part 70 Operating Permit Renewal No. T 089-23826-00204, issued on February 20, 2009.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Amsted Rail Company, Inc. on March 30, 2011, relating to installation of one (1) quench tank, one (1) draw furnace, and two (2) shot peeners. The following is a list of the proposed emission units and pollution control devices:

(a) One (1) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, including an oil quench tank, identified as 3-2838A, permitted in 2011, using a fabric filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14.

(b) One (1) natural gas-fired draw furnace associated with the Medium Line Coil Spring Manufacturing Process, identified as 2-5097A, permitted in 2011, with a maximum design capacity of 5.0 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(c) One (1) Shot Peener, identified as 3-1824, permitted in 2011**,** with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3024, for control of particulate matter emissions, and exhausting to Stack 24.

(d) One (1) Shot Peener, identified as 3-1825, permitted in 2011**,** with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3025, for control of particulate matter emissions, and exhausting to Stack 25.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

The following table summarizes the stacks that correspond to the new emission units.

Table 3: Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{0}F)
24	Shot Peener (3-1824)	*	*	*	*
25	Shot Peener (3-1825)	*	*	*	*

* No data was available for the proposed new stacks at the time of application.

Emission Calculations

The calculations are provided in Appendix A of this document.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Table 4: Increase in PTE Before Controls of the Modification

Pollutant	**Potential To Emit** (ton/yr)
CO	0.83
NO_X	1.96
PM	920.28
PM_{10}	230.16
$PM_{2.5}$	230.16
SO_2	0.01
VOC	153.41
HAP Hexane	0.04
Total HAPs	0.04

This source modification is subject to 326 IAC 2-7-10.5(f) because the potential to emit PM and PM10 is greater than twenty-five (25) tons per year, each. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because it involves a case-by-case determination of emission limitations and standards.

Permit Level Determination – PSD and Nonattainment New Source Review

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Table 5: Potential to Emit after Issuance (ton/yr)

Process / Emission Unit	CO	NO_X	PM	PM_{10}	$PM_{2.5}$	SO_2	VOC
NEW Shot Peener (3-1824)	0	0	4.34	4.34	4.34	0	0
NEW Shot Peener (3-1825)	0	0	4.34	4.34	4.34	0	0
NEW Medium Line Quench Tank (3-2838A)	0	0	13.02	13.02	13.02	0	13.02
NEW Medium Line Draw Furnace (2-5097A)	0.83	1.96	0.04	0.16	0.16	0.01	0.11
Existing Furnaces	10.95	25.72	0.52	2.08	2.08	0.16	1.51
Exisitng Quench Tanks	0	0	26.05	12.26	12.26	0	12.26
Existing Grinders	0	0	4.34	28.94	4.34	0	0
Existing Shot Peeners	0	0	13.02	0.81	0.81	0	0
Existing Painting Operations	0	0	1.04	1.04	1.04	0	132.00
Source-wide PTE after Modification	**11.78**	**27.68**	**66.71**	**66.99**	**42.39**	**0.18**	**158.91**
PSD Major Source Threshold	250	250	250	250	NA	250	250
Nonattainment NSR Major Source Threshold	NA	NA	NA	NA	100	NA	NA

This modification to an existing minor stationary source for PSD is not major because the source-wide emissions are still less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This modification to an existing minor stationary source for Nonattainment NSR is not major because the source-wide $PM_{2.5}$ emissions are still less than the Nonattainment NSR major level. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment NSR requirements do not apply.

Federal Rule Applicability Determination

There are no changes to Federal Rule Applicability as a result of this modification.

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

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61, and 40 CFR Part 63) included in the permit for this proposed modification.

(c) Compliance Assurance Monitoring (CAM)
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Table 6: CAM Applicability Analysis

Emission Unit	Control Device Used	Emission Limitation / Standard (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Medium Line Quench Tank (3-2838A) - PM_{10}	BH	Y	153.30	3.07	100	Y	N
Medium Line Quench Tank (3-2838A) - $PM_{2.5}$	BH	Y	153.30	3.07	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the Medium Line Quench Tank (3-2838A) for PM_{10} and $PM_{2.5}$ upon issuance of the Title V Renewal.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-1.1-5 (Nonattainment New Source Review)
Lake County has been designated as nonattainment for $PM_{2.5}$. Since the unrestricted potential to emit of this source is greater than one hundred (100) tons of $PM_{2.5}$ per year, this source has elected to limit the potential to emit as follows:

Emission Unit	ID	$PM_{2.5}$ Limit (lb/hr)
Shot Peener	3-1824	0.99
Shot Peener	3-1825	0.99
Medium Line Quench Tank	3-2838A	2.97
Small Line Quench Tank	3-2821	1.05
Large Line Quench Tank	3-2845	1.75

Emission Unit	ID	$PM_{2.5}$ Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99
Torrington Ferris Wheel Grinder	3-0247	
Gardner Paddle Wheel Grinder	3-0249	
#1 Besley Ferris Wheel Grinder	3-0385	
#2 Besley Ferris Wheel Grinder	3-0386	
Gardner Tub Grinder	3-0389	
#2 Mattison (Small) Grinder	3-0393	
Besley Swing Grinder	3-0394	
Vertical Opposing Disc Grinder	3-0396	
Vertical Opposing Disc Grinder	3-0397	
Shot Peener	3-1804	0.06
Shot Peener	3-1821	0.06
Shot Peener	3-1823	0.06

Compliance with these emission limits combined with the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

326 IAC 2-2 (PSD)

(a) Since the unrestricted potential to emit of this source is greater than two hundred fifty (250) tons of PM and PM_{10} per year, this source has elected to limit the potential to emit as follows:

Emission Unit	ID	PM Limit (lb/hr)	PM_{10} Limit (lb/hr)
Shot Peener	3-1824	0.99	0.99
Shot Peener	3-1825	0.99	0.99
Medium Line Quench Tank	3-2838A	2.97	2.97
Small Line Quench Tank	3-2821	2.97	1.05
Large Line Quench Tank	3-2845	2.97	1.75
#1 Mattison (Large) Grinder	3-0244	0.99	2.085
Torrington Ferris Wheel Grinder	3-0247		
Gardner Paddle Wheel Grinder	3-0249		
#1 Besley Ferris Wheel Grinder	3-0385		
#2 Besley Ferris Wheel Grinder	3-0386		
Gardner Tub Grinder	3-0389		
#2 Mattison (Small) Grinder	3-0393		
Besley Swing Grinder	3-0394		
Vertical Opposing Disc Grinder	3-0396		1.89
Vertical Opposing Disc Grinder	3-0397		2.64
Shot Peener	3-1804	0.99	0.06
Shot Peener	3-1821	0.99	0.06
Shot Peener	3-1823	0.99	0.06

(b) Since the unrestricted potential to emit of this source is greater than two hundred fifty (250) tons of VOC per year, this source has elected to limit the potential to emit as follows:

Emission Unit	ID	VOC Limit (ton/yr)
Dip Coating	3-2813	74.81
Dip Coating	3-2865	
Dip Coating	3-2865A	
Dip Coating	3-2867	
Dip Coating	3-2870	
Dip Coating	3-2869	55.19
Dip Coating	3-2872	
Dip Coating	3-2873	

Compliance with these emission limits combined with the potential to emit PM, PM_{10}, and VOC emissions from all other equipment at this source will limit the potential to emit of PM, PM_{10}, and VOC from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the medium line quench tank (3-2838A), medium line draw furnace (2-5097A), and shot peeners (3-1824 and 3-1825), will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Since this source is located in Lake County, and has a potential to emit NO_X and VOC greater than or equal to twenty-five (25) tons per year, an emission statement covering the previous calendar year must be submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-2 (Particulate Emissions Limitations for Source of Indirect Heating)
Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions from the medium line draw furnace (2-5097A) shall be limited to 0.36 pounds per MMBtu heat input. This emission limit was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.
= 70.6 MMBtu/hr

However; pursuant to 326 IAC 6-2-1(e), since the the operation of the medium line draw furnace (2-5097A) is subject to a PM emission limit under 326 IAC 6.8, and this limit is inconsistent with the limit from 326 IAC 6-2-4, the PM emission limit under 326 IAC 6.8 shall prevail.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the medium line quench tank (3-2838A) and shot peeners (3-1824 and 3-1825) shall not exceed the values in the following table:

Emission Unit	**ID**	**PM Limit** (lb/hr)	**P** (ton/hr)
Shot Peener	3-1824	12.3	5.15
Shot Peener	3-1825	12.3	5.15
Medium Line Quench Tank	3-2838A	12.1	5.0

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

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

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

However; pursuant to 326 IAC 6-3-1(c)(3), since the operation of the medium line quench tank (3-2838A) and shot peeners (3-1824 and 3-1825) are subject to PM emission limits under 326 IAC 6.8, and this limit is more stringent than the limit from 326 IAC 6-3-2; the PM emission limit under 326 IAC 6.8 shall prevail.

326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-2(a), the particulate matter (PM) emissions from the medium line quench tank (3-2838A), medium line draw furnace (2-5097A), and shot peeners (3-1824 and 3-1825) shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures)
The Permittee shall comply with the applicable provisions of 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The uncontrolled VOC emissions from this Medium Quench Tank (3-2838A) shall be limited to less than 25 tons per twelve consecutive month period, with compliance determined each month.

This emission limit shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to the Medium Line Quench Tank (3-2838A).

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
Since the this source is located in Lake County and VOC emissions from the surface coating activities exceed fifteen (15) pounds per day before add-on controls, pursuant to 326 IAC 8-2-9(d)(1)(A), the Permittee shall comply with the following VOC emission limits for the surface coating activities on and after April 1, 2011, because the all coating operations at Amsted Rail Company, Inc. use general, one component, coatings that are air dried:

Emission Unit	**ID**	**VOC Limit** (lbVOC/gal coating, less water)
Paint Spray Booth	3-2714	2.8
Paint Spray Booth	3-2715	2.8
Dip Coating	3-2813	2.8
Dip Coating	3-2865	2.8
Dip Coating	3-2865A	2.8
Dip Coating	3-2867	2.8
Dip Coating	3-2870	2.8
Dip Coating	3-2869	2.8
Dip Coating	3-2872	2.8
Dip Coating	3-2873	2.8

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

Compliance Determination Requirements
The Compliance Determination Requirements applicable to this modification are as follows:

Emission Unit	**Control Device**	**Timeframe for Testing**	**Testing Frequency**	**Pollutant**	**Limit or Requirement**
quench tank (3-2838A)	baghouse 3-3027A	within 180 days of operation	Once every 5 years	PM	326 IAC 6.8-1-2(a)
				PM/PM_{10}/VOC	326 IAC 2-2
				$PM_{2.5}$	326 IAC 2-1.1-5
shot peener (3-1824) *or* shot peener (3-1825)	baghouse 3-3024 *or* baghouse 3-3025	within 180 days of operation	Once every 5 years	PM	326 IAC 6.8-1-2(a)
				PM/PM_{10}	326 IAC 2-2
				$PM_{2.5}$	326 IAC 2-1.1-5

To demonstrate compliance with the $PM/PM_{10}/PM_{2.5}$ emissions for the medium line quench tank (3-2838A) and shot peeners (3-1824 and 3-1825), each of the baghouses associated with the medium line quench tank (3-2838A) and shot peeners (3-1824 and 3-1825) shall be in operation and control emissions at all times when any of the associated units are in operation.

Compliance Monitoring Requirements
The compliance monitoring requirements applicable to this modification are as follows:

Process/ Control Device	Parameter	Frequency	Range	Excursions /Exceedances
quench tank (3-2838A) baghouse 3-3027A	Water Pressure Drop	Daily	3 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
shot peener (3-1824) baghouse 3-3024	Water Pressure Drop	Daily	3 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
shot peener (3-1825) baghouse 3-3025	Water Pressure Drop	Daily	3 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary to ensure compliance with 326 IAC 6.8-1 (Particulate Emission Limitations for Lake County), 326 IAC 6.8-2 (Lake County: PM_{10} Emission Requirements), 326 IAC 2-1.1-5 (Nonattainment New Source Review), 326 IAC 2-7 (Part 70), and 326 IAC 2-2 Minor Limits.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. T 089-23826-00204. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change No. 1 The emission Unit Descriptions in Conditions A.2 and A.3 have been updated as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) - (b) ...

(c) Coil Spring Manufacturing Process Lines, which include the following:

(1) ...

~~(2) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 6,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2838, constructed in 1956, using an electrostatic precipitator, identified as 3-3027, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. The process also includes a natural gas-fired draw furnace, identified as 2-5097, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.~~

(2) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2838A, permitted in 2011, using a fabric filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. The process also includes a natural gas-fired draw furnace, identified as 2-5097A, permitted in 2011, with a maximum design capacity of 5.0 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(3) ...

(d) ...

(e) Coil Spring Coating Dip Tanks, for application of rust preventative coatings, which include the following:

Unit ID	Coating
3-2813	Water-based Clear Coating
3-2865	Water-based Clear Coating
3-2865A	Water-based Clear Coating
3-2867	Water-based Clear Coating
3-2870	Water-based Clear Coating
3-2869	Solvent-based **or Water-based** Clear Coating
3-2872	Solvent-based **or Water-based** Clear Coating
3-2873	Solvent-based **or Water-based** Clear Coating

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

(a) ...

(b) Shot Peeners, regulated by 326 IAC 6.8-2-4(a), which include the following units:

(1) Pangborn Shot Peener, identified as 3-1804, with a maximum capacity of 0.012 tons steel shots used per hour, using a baghouse, identified as 3-3017, as control, constructed in 1964**,** and exhausting to Stack 9.

~~(2) Wheelabrator Shot Peener, identified as 3-1811, with a maximum capacity of 0.185 tons steel shots used per hour, using a baghouse, identified as 3-1811, as control, constructed in 1951, and exhausting to Stack 10.~~

~~(3)~~**(2)** Wheelabrator Shot Peener, identified as 3-1821, with a maximum capacity of 0.12 tons steel shots used per hour, using a baghouse, identified as 3-3022, as control, constructed in 1972**,** and exhausting to Stack 11.

~~(4)~~**(3)** Wheelabrator Shot Peener, identified as 3-1823, with a maximum capacity of 0.21 tons steel shots used per hour, using a baghouse, identified as 3-1823, as control, constructed in 1980**,** and exhausting to Stack 12.

(4) One (1) Shot Peener, identified as 3-1824, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3024, for control of particulate matter emissions, and exhausting to Stack 24.

(5) One (1) Shot Peener, identified as 3-1825, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3025, for control of particulate matter emissions, and exhausting to Stack 25.

(c) - (k) ...

Change No. 2 Section D.2 is updated as follows:

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Coil Spring Grinders, which include the following:

Unit ID	Unit Description	Maximum Design Rate *(tons springs ground per hour)*
3-0386	#2 Besley Ferris Wheel Grinder	1.11
3-0389	Gardner Tub Grinder	0.55
3-0385	#1 Besley Ferris Wheel Grinder	1.55
3-0394	Besley Swing Grinder	0.35
3-0249	Gardner Paddle Wheel Grinder	0.15
3-0247	Torrington Ferris Wheel Grinder	0.91
3-0244	#1 Mattison (Large) Grinder	2.15
3-0393	#2 Mattison (Small) Grinder	2.15
3-0396	Vertical Opposing Disc Grinder	1.11
3-0397	Vertical Opposing Disc Grinder	1.55

All the coil spring grinders above are controlled using a pulse-jet baghouse, identified as 3-3037, exhausting to Stack 3.

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

D.2.3 PSD Minor Limits [326 IAC 2-2]

PM and PM_{10} emissions shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM_{10} Limit (lb/hr)
#1 Mattison (Large) Grinder	**3-0244**	**0.99**	**2.085**
Torrington Ferris Wheel Grinder	**3-0247**		
Gardner Paddle Wheel Grinder	**3-0249**		
#1 Besley Ferris Wheel Grinder	**3-0385**		
#2 Besley Ferris Wheel Grinder	**3-0386**		
Gardner Tub Grinder	**3-0389**		
#2 Mattison (Small) Grinder	**3-0393**		
Besley Swing Grinder	**3-0394**		
Vertical Opposing Disc Grinder	**3-0396**		**1.89**
Vertical Opposing Disc Grinder	**3-0397**		**2.64**

Compliance with these emission limits combined with the limits in Conditions D.3.5 and D.7.3, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

D.2.4 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5]

$PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	$PM_{2.5}$ Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99
Torrington Ferris Wheel Grinder	3-0247	
Gardner Paddle Wheel Grinder	3-0249	
#1 Besley Ferris Wheel Grinder	3-0385	
#2 Besley Ferris Wheel Grinder	3-0386	
Gardner Tub Grinder	3-0389	
#2 Mattison (Small) Grinder	3-0393	
Besley Swing Grinder	3-0394	
Vertical Opposing Disc Grinder	3-0396	
Vertical Opposing Disc Grinder	3-0397	

Compliance with these emission limits combined with the limits in Conditions D.3.6 and D.7.4, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

~~D.2.4~~ **D.2.6** Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]

(a) Pursuant to 326 IAC 2-7-6 and in order to comply with Conditions D.2.1**,** ~~and~~ D.2.2, **D.2.3, and D.2.4,** the baghouse for ~~PM and PM_{10}~~ **PM, PM_{10}, and $PM_{2.5}$** control shall be in operation and control emissions at all times when any of the grinders is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM-OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

~~D.2.5~~ **D.2.7** Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with ~~Condition~~ **Conditions D.2.1,** D.2.2, **and D.2.3,** the Permittee shall perform **PM,** PM_{10}, **and $PM_{2.5}$** testing of the baghouse controlling the grinders. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition. PM_{10} and $PM_{2.5}$ include filterable and condensable PM. A demonstration of compliance with the PM_{10} limits in D.2.2 may be used to demonstrate compliance with the PM limit in D.2.1.

Change No. 3 Section D.3 is updated as follows for the Coil Spring Manufacturing Processes:

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Coil Spring Manufacturing Process Lines, which include the following:

(1) Small Line Coil Spring Manufacturing Process, with a maximum capacity of 3,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2821, constructed in 1973, using an electrostatic precipitator, identified as 3-3024, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 13. The process also includes a natural gas-fired draw furnace, identified as 2-5163, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

~~(2) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 6,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2838, constructed in 1956, using an electrostatic precipitator, identified as 3-3027, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. The process also includes a natural gas-fired draw furnace, identified as 2-5097, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.~~

(2) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2838A, permitted in 2011, using a fabric filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. The process also includes a natural gas-fired draw furnace, identified as 2-5097A, permitted in 2011, with a maximum design capacity of 5.0 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

(3) Large Line Coil Spring Manufacturing Process, with a maximum capacity of 10,000 lbs/hr of coil springs manufactured, includes an oil quench tank, identified as 3-2845, constructed in 1959, using an electrostatic precipitator, identified as 3-3036, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 15. The process also includes a natural gas-fired draw furnace, identified as 2-5164, with a maximum design capacity of 9.8 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(a) (Lake County: PM_{10} Emission Requirements) emissions of particulate matter less than ten microns in diameter (PM_{10}) from these units shall be limited to:

Unit ID	Emission Limit (lb/hr)
Small Line Coil Spring Manufacturing Process **(ESP 3-3024)**	1.05
~~Medium Line Coil Spring Manufacturing Process~~	~~1.05~~
Large Line Coil Spring Manufacturing Process **(ESP 3-3028)**	1.75

D.3.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2] [40 CFR 64]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County) emissions of particulate matter (PM) from the medium line quench tanks (3-2838A, 3-2821, and 3-2845) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.3.3 VOC BACT Minor Limit [326 IAC 8-1-6]

The uncontrolled VOC emissions from this Medium Quench Tank (3-2838A) shall be limited to less than 25 tons per twelve consecutive month period, with compliance determined each month.

This limit shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) are not applicable to the medium line quench tank (3-2838A).

D.3.4 PSD Minor Limits [326 IAC 2-2]

PM and PM_{10} emissions shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM_{10} Limit (lb/hr)
Medium Line Quench Tank	3-2838A	2.97	2.97
Small Line Quench Tank	3-2821	2.97	1.05
Large Line Quench Tank	3-2845	2.97	1.75

Compliance with these emission limits combined with the limits in Conditions D.2.3 and D.7.3, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

D.3.5 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5] [40 CFR 64]

$PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	$PM_{2.5}$ Limit (lb/hr)
Medium Line Quench Tank	3-2838A	2.97
Small Line Quench Tank	3-2821	1.05
Large Line Quench Tank	3-2845	1.75

Compliance with these emission limits combined with the limits in Conditions D.2.4 and D.7.4, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

~~D.3.2~~ **D.3.6** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their associated electrostatic precipitators.~~ **A Preventive Maintenance Plan (PMP) is required for these facilities and their associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.**

Compliance Determination Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

~~D.3.3~~ **D.3.7** Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5] **[40 CFR 64]**

(a) Pursuant to 326 IAC 2-7-6 and in order to comply with ~~Condition D.3.1~~ **Conditions D.3.1, D.3.4, and D.3.5**, the electrostatic precipitators for PM**, PM_{10}, and $PM_{2.5}$,** control shall be in operation and control emissions at all times when the associated Small Line Coil Spring Manufacturing Process~~, Medium Line Coil Spring Manufacturing Process,~~ or Large Line Coil Spring Manufacturing Process is in operation.

(b) Pursuant to 326 IAC 2-7-6 and in order to comply with Conditions D.3.2, D.3.4, and D.3.5, the baghouse for PM, PM_{10}, $PM_{2.5}$, and VOC control shall be in operation and control emissions at all times when the associated Medium Line Coil Spring Manufacturing Process is in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM-OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.3.8 Testing Requirements [326 IAC 2-1.1-11] [40 CFR 64]

(a) In order to demonstrate compliance with Conditions D.3.2, D.3.4, and D.3.5, the Permittee shall perform PM, PM_{10}, $PM_{2.5}$, and VOC testing of the baghouse controlling the oil quench tank (3-2838A) associated with the Medium Line Coil Spring Manufacturing Process within one hundred eighty (180) days of operation of the Medium Line Coil Spring Manufacturing Process. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate compliance with Conditions D.3.1, D.3.4 and D.3.5, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$, testing of the electrostatic precipitator controlling the oil quench tank (3-2821) associated with the Small Line Coil Spring Manufacturing Process, and the electrostatic precipitator controlling the oil quench tank (3-2845) associated with the Large Line Coil Spring Manufacturing Process within one hundred eighty (180) days of issuance of SSM No. 089-30392-00204. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(c) In order to demonstrate compliance with Condition D.3.3, the Permittee shall perform testing of uncontrolled VOC (point source and fugitive) emissions from the medium line quench tank (3-2838A) within one hundred eighty (180) days of issuance of SSM No. 089-30392-00204.

PM, PM_{10}, $PM_{2.5}$, and VOC testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

D.3.9 Volatile Organic Compounds (VOC)

Compliance with Condition D.3.3 shall be determined using the following equation:

$$E = \frac{T \times EF}{2000 lb/ton}$$

where:
E = Uncontrolled VOC emissions in tons/month
T = Process Throughput in tons/month
EF = Uncontrolled VOC (point source and fugitives) emission factor in lb VOC /ton steel, as determined by a valid compliance demonstration

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)] [40 CFR 64]

~~D.3.4~~ **D.3.10 Visible Emissions Notations[40 CFR 64]**

(a) **Visible Emissions Notations:**

(1) Visible emission notations of the electrostatic precipitator stack exhaust for the Large Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

(2) Visible emission notations of the baghouse stack exhaust for the Medium Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations.

A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

~~D.3.5 Parametric Monitoring~~

~~In order to comply with Condition D.3.1, the Permittee shall monitor the hours of operation of the Large Line Coil Spring Manufacturing Process and clean the associated electrostatic precipitator and cartridges after 400 hours or less of operation.~~

D.3.11 Parametric Monitoring (Baghouse) [40 CFR 64]

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Medium Line Coil Spring Manufacturing Process at least once per day when any of the Medium Line Coil Spring Manufacturing Process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 64]

~~D.3.6~~ **D.3.12** Record Keeping Requirements**[40 CFR 64]**

(a) To document compliance with Conditions D.3.3 and D.3.9, the Permittee shall maintain records of the monthly VOC emissions (tons) and the monthly process throughput (tons) for the quench tanks.

~~(a)~~ **(b)** To document compliance with Condition ~~D.3.4~~ **D.3.10**, the Permittee shall maintain daily records of visible emission notations of the Large Line Coil Spring Manufacturing Process electrostatic precipitator stack exhaust **and the Medium Line Coil Spring Manufacturing Process baghouse stack exhaust**. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

~~(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the hours of operation of the electrostatic precipitator and the dates that the cartridges for the Large Line Coil Spring Manufacturing Process are cleaned.~~

(c) To document compliance with Condition D.3.11, the Permittee shall maintain a daily record of the pressure drop reading across the baghouse controlling the processes. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

~~(c)~~ **(d)** ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.**

D.3.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.3.3 (uncontrolled fugitive VOC emissions and controlled VOC emissions from the medium line quench tank (3-2838A)), and D.3.9, shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days following the end of each quarter. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

Part 70 Quarterly Report

Facility:	**Medium Line Quench Tank (3-2838A)**
Parameter:	**Uncontrolled (fugitive and point source) VOC Emissions**
Limit:	**Not to exceed 13.02 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

Change No. 4 Section D.4 is updated as follows:

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Paint Spray Booths, which include the following:

(1) Paint Spray Booth, identified as 3-2715, using dry filters - double wall as PM control, constructed in 1989.

(2) Paint Spray Booth, identified as 3-2714, using dry filters - double wall as PM control, constructed in 1980.

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-2-9]

~~(a)~~ Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied at each of the two (2) paint spray booths, identified as 3-2715 and 3-2714, shall be limited to ~~3.5~~ **2.8** pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day, for air-dried/~~extreme performance~~ **general, one component** coatings.

~~(1)~~ Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. The volume weighted average shall be determined by the following equation:

$$A = [\sum(C \times U) / \sum U]$$

Where:
A = volume weighted average in pounds VOC per gallon less water, as applied
C = VOC content of the coating in pounds VOC per gallon less water, as applied; and
U = usage rate of the coating in gallons per day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their dry filters.~~ **A Preventive Maintenance Plan (PMP) is required for these facilities and their dry filters. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.**

D.4.6 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records of the following:

(1) The dates of operation, per paint spray booth.

(2) The quantity and VOC content of each coating less water and solvent used per day of operation, per paint spray booth.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings less water as applied per day of operation, per paint spray booth.

(b) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily inspections of the dry filters, weekly paint booth overspray observations, and monthly inspections of nearby ground for presence of overspray.

(c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.**

Change No. 5 Section D.5 is updated as follows:

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Coil Spring Coating Dip Tanks, for application of rust preventative coatings, which include the following:

Unit ID	Coating
3-2813	Water-based Clear Coating
3-2865	Water-based Clear Coating
3-2865A	Water-based Clear Coating
3-2867	Water-based Clear Coating
3-2870	Water-based Clear Coating
3-2869	Solvent-based **or Water-based** Clear Coating
3-2872	Solvent-based **or Water-based** Clear Coating
3-2873	Solvent-based **or Water-based** Clear Coating

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of clear coating applied at each of the coating dip tanks shall be limited to ~~4.3~~ **2.8** pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day**, for air-dried/ general, one component coatings**.

(b) Compliance with the VOC content limits in Permit Conditions D.5.1(a) and (b) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. The volume-weighted average shall be determined by the following equation:

$A = [\sum(C \times U) / \sum U]$

Where:
A = volume weighted average in pounds VOC per gallon less water, as applied
C = VOC content of the coating in pounds VOC per gallon less water, as applied; and
U = usage rate of the coating in gallons per day.

D.5.2 PSD Minor Limit [326 IAC 2-2]

VOC emissions shall be limited to:

Emission Unit	ID	VOC Limit (ton/yr)
Dip Coating	**3-2813**	**74.81**
Dip Coating	**3-2865**	
Dip Coating	**3-2865A**	
Dip Coating	**3-2867**	
Dip Coating	**3-2870**	
Dip Coating	**3-2869**	**55.19**
Dip Coating	**3-2872**	
Dip Coating	**3-2873**	

Compliance with these emission limits combined with the limits in Conditions D.3.3 and D.3.4, and the potential to emit VOC emissions from all other equipment at this source will limit the potential to emit of VOC from the entire source to less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for VOC.

~~D.5.3~~ **D.5.4** Record Keeping Requirements

(a) To document compliance with ~~Condition~~ **Conditions** D.5.1 **and D.5.2**, the Permittee shall maintain monthly records of the following for compliant coatings:

(1) The dates of operation during each month, per coating type.

(2) The quantity and VOC content of each coating less water and solvent used each month, per coating type (e.g., water-based clear coatings, solvent-based clear coatings, or other coatings).

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted average VOC content of the coatings less water as applied per day of operation, per coating type (e.g., water-based clear coatings, solvent-based clear coatings, or other coatings).

(4) In the event solvent is added to a compliant coating by the Permittee, the Permittee shall maintain daily records of the information required in Condition D.5.3(a)(1)-(3) for the coating and solvent added.

(b) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.**

Change No. 6 Section D.6 is updated as follows for the Medium Line Draw Furnace (2-5097A):

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Natural gas-fired furnaces, which include the following:

Unit ID	Unit Description	Maximum Design Capacity *(MMBtu/hr heat input)*
2-5085	Small Line Bar Furnace	8.0
2-5006	Small Line Slot Furnace	1.5
2-5014	Medium Line Slot Furnace	5.2 *(for Units 2-5014 and 2-5015 combined)*
2-5015	Medium Line Slot Furnace	
2-5036	Large Line Slot Furnace	2.5
2-5163	Small Line Draw Furnace	5.1
~~2-5097~~	~~Medium Line Draw Furnace~~	~~5.1~~
2-5097A	**Medium Line Draw Furnace**	**5.0**
2-5164	Large Line Draw Furnace	9.8

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(b) (Lake County: PM_{10} and total suspended particulates (TSP) emissions), theSmall Line Bar Furnace (2-5085), Small Line Slot Furnace (2-5006), Medium Line Slot Furnaces (2-5014 and 2-5015), Large Line Slot Furnace (2-5036), Small Line Draw Furnace (2-5163~~), Medium Line Draw Furnace (2-5097),~~ and Large Line Draw Furnace (2-5164) shall fire natural gas only.

D.6.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County) emissions of particulate matter (PM) from the Medium Line Draw Furnace (2-5097A), shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Change No. 7 Section D.7 is updated as follows for the shot peeners:

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) Shot Peeners, regulated by 326 IAC 6.8-2-4(a), which include the following units:

(1) Pangborn Shot Peener, identified as 3-1804, with a maximum capacity of 0.012 tons steel shots used per hour, using a baghouse, identified as 3-3017, as control, constructed in 1964**,** and exhausting to Stack 9.

~~(2) Wheelabrator Shot Peener, identified as 3-1811, with a maximum capacity of 0.185 tons steel shots used per hour, using a baghouse, identified as 3-1811, as control, constructed in 1951, and exhausting to Stack 10.~~

~~(3)~~**(2)** Wheelabrator Shot Peener, identified as 3-1821, with a maximum capacity of 0.12 tons steel shots used per hour, using a baghouse, identified as 3-3022, as control, constructed in 1972**,** and exhausting to Stack 11.

~~(4)~~**(3)** Wheelabrator Shot Peener, identified as 3-1823, with a maximum capacity of 0.21 tons steel shots used per hour, using a baghouse, identified as 3-1823, as control, constructed in 1980**,** and exhausting to Stack 12.

(4) One (1) Shot Peener, identified as 3-1824, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3024, for control of particulate matter emissions, and exhausting to Stack 24.

(5) One (1) Shot Peener, identified as 3-1825, permitted in 2011, with a maximum capacity of 5.15 tons steel parts used per hour, using a baghouse, identified as 3-3025, for control of particulate matter emissions, and exhausting to Stack 25.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(a) (Lake County: PM_{10} Emission Requirements) emissions of particulate matter less than ten microns in diameter (PM_{10}) from these units shall be limited to:

Facility	Emission **Limit** (lb/ton)	Emission **Limit** (lb/hr)
Pangborn Shot Peener (3-1804)	0.011	0.06
~~Wheelabrator Shot Peener (3-1811)~~	~~0.018~~	~~0.06~~
Wheelabrator Shot Peener (3-1821)	0.016	0.06
Wheelabrator Shot Peener (3-1823)	0.016	0.06

D.7.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County) emissions of particulate matter (PM) from Shot Peener (3-1824) and Shot Peener (3-1825) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.7.3 PSD Minor Limits [326 IAC 2-2]

PM and PM_{10} emissions shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM_{10} Limit (lb/hr)
Shot Peener	3-1824	0.99	0.99
Shot Peener	3-1825	0.99	0.99
Shot Peener	3-1804	0.99	0.06
Shot Peener	3-1821	0.99	0.06
Shot Peener	3-1823	0.99	0.06

Compliance with these emission limits combined with the limits in Conditions D.2.3 and D.3.5, and the unrestricted potential to emit PM and PM_{10} emissions from all other equipment at this source will limit the potential to emit of PM and PM_{10} from the entire source to less than two hundred fifty (250) tons per year, each. Therefore the requirements of 326 IAC 2-2 (PSD) are not applicable to the entire source for PM and PM_{10}.

D.7.4 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5]

$PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	$PM_{2.5}$ Limit (lb/hr)
Shot Peener	3-1824	0.99
Shot Peener	3-1825	0.99
Shot Peener	3-1804	0.06
Shot Peener	3-1821	0.06
Shot Peener	3-1823	0.06

Compliance with these emission limits combined with the limits in Conditions D.2.4 and D.3.6, and the unrestricted potential to emit $PM_{2.5}$ emissions from all other equipment at this source will limit the potential to emit from the entire source to less than one hundred (100) tons per year of $PM_{2.5}$. Therefore the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the entire source.

~~D.7.2~~ **D.7.5** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their associated baghouses.~~ **A Preventive Maintenance Plan (PMP) is required for these facilities and their associated baghouses. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.**

Compliance Determination Requirements

~~D.7.3~~ **D.7.6** Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]

(a) In order to comply with ~~Condition D.7.1~~ **Conditions D.7.1, D.7.2, D.7.3, and D.7.4**, the bag filter dust collectors for PM**,** ~~and~~ PM_{10}**, and $PM_{2.5}$,** control shall be in operation and control emissions from their associated facilities at all times that the facilities are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM-OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.7.7 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.7.2, D.7.3, and D.7.4, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on one of the baghouses controlling Shot Peener (3-1824) and Shot Peener (3-1825) within one hundred eighty (180) days of operation of each Shot Peener. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate compliance with Conditions D.7.1, D.7.3 and D.7.4, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on one of the baghouses controlling Shot Peener (3-3017), Shot Peener (3-3022), or Shot Peener (3-1823) within one hundred eighty (180) days of issuance of SSM No. 089-30392-00204. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years on alternate baghouses from the date of this valid compliance demonstration. Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.7.8 Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhausts for Shot Peener (3-1824) and Shot Peener (3-1825) shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

D.7.9 Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with Shot Peener (3-1824) and Shot Peener (3-1825) at least once per day when any of Shot Peeners are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.10 Record Keeping Requirements

(a) To document compliance with Condition D.7.8, the Permittee shall maintain daily records of visible emission notations of the Shot Peener (3-1824) and Shot Peener (3-1825) baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document compliance with Condition D.7.9, the Permittee shall maintain a daily record of the pressure drop reading across the baghouses controlling Shot Peener (3-1824) and Shot Peener (3-1825). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

Change No. 8 IDEM has removed the mailing address from Condition A.1 and the reporting forms.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary steel coil spring manufacturing plant.

Source Address:	4831 Hohman Avenue, Hammond, Indiana 46327
~~Mailing Address:~~	~~4831 Hohman Avenue, Hammond, IN 46327~~
General Source Phone Number:	(219) 931-1900
SIC Code:	3493
County Location:	Lake
Source Location Status:	~~Nonattainment for 8-hour ozone standard~~
	Nonattainment for $PM_{2.5}$ standard
	Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Minor Source, under PSD
	~~Major Source, under Emission Offset Rules~~
	Minor Source, under Nonattainment New Source Review for $PM_{2.5}$
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

Reporting Forms:

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
~~Mailing Address: 4831 Hohman Avenue, Hammond, Indiana 46327~~
Part 70 Permit No.: T089-23826-00204

Change No. 9 "Permit Term" has been clarified as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) ~~This permit,~~ **The Part 70 Operating Permit Renewal,** T089-23826-00204, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) ...

Change No. 10 There may be times when it is unnecessary for a responsible official to "certify" additional information requested by IDEM; therefore, paragraph (a) of Condition B.7, "Duty to Provide Information" is revised as follows:

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ**,** may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ**,** copies of records required to be kept by this permit.

(b) ...

Change No. 11 "Certification" is revised as follows:

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain~~**A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**

(i) **it contains a** certification by ~~the~~ **a** "responsible official" ~~of truth, accuracy~~**as defined by 326 IAC 2-7-1(34)**, and ~~completeness. This~~

(ii) **the** certification ~~shall state~~**states** that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) ~~One (1) certification shall be included, using~~**The Permittee may use** the attached Certification Form, **or its equivalent,** with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

Change No. 12 "Preventive Maintenance Plan" requirements have been clarified as follows:

B.10 Preventive Maintenance Plan [326 IAC 2-7-5~~(1),(3) and~~ (13)] ~~[326 IAC 2-7-6(1) and (6)]~~ [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.

(~~a~~**b**) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~ **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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(~~b~~**c**) A copy of the PMPs shall be submitted to IDEM, OAQ**,** upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ**,** may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions ~~or potential to emit.~~ **.** The PMPs **and their submittal** do not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(~~c~~**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.

Change No. 13 "Emergency Provisions" is updated as follows:

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) ...

(b) …

(1) - (3) …

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM-OAQ and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267**.**

(5) …

The notification which shall be submitted by the Permittee does not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(6) ...

(c) - (g) ...

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

Change No. 14 IDEM has removed Condition B.15 "Deviations from Permit Requirements and Conditions" as shown below. These requirements have been moved to the General Reporting Requirements in Section C of the permit.

B.15 **RESERVED** ~~Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]~~

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

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

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

Change No. 15 "Permit Renewal" is clarified as follows:

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

…

(b) …

(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 2-7 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 2-7-4(a)(2)(D),** in writing by IDEM, OAQ**,** any additional information identified as being needed to process the application.

Change No. 16 "Permit Amendment or Modification" is clarified as follows:

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) ...

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application ~~shall be certified~~**does require a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

(c) ...

Change No. 17 "Permit Revision Under Economic Incentives and Other Programs" is clarified as follows:

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) ...

Change No. 18 "Transfer of Ownership or Operational Control" is clarified as follows:

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) ...

(b) …

~~The~~ **Any such** application ~~which shall be submitted by the Permittee~~ does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

(c) …

Change No. 19 "Opacity" is clarified as follows:

C.1 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) - (b) ...

Change No. 20 "Incineration" is clarified as follows:

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

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

Change No. 21 "Performance Testing" is clarified as follows:

C.9 Performance Testing [326 IAC 3-6]

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

~~A~~ **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. The protocol submitted by the Permittee does not require **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ**,** of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(c) ...

Change No. 22 "Compliance Monitoring" is clarified as follows:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, **for** all monitoring ~~and record keeping~~ requirements not already legally required**, the Permittee** shall be ~~implemented within~~ **allowed up to** ninety (90) days **from the date** of permit issuance or ~~ninety (90) days~~ of initial start-up, whichever is later~~. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required~~**, to begin such** monitoring ~~related to that equipment~~. If due to circumstances beyond ~~its~~ **the Permittee's** control, ~~that equipment~~ **any monitoring equipment required by this permit** cannot be installed and operated ~~within~~ **no later than** ninety (90) days **after permit issuance or the date of initial startup, whichever is later**, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

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

Change No. 23 The general requirements for "Monitoring Methods" were removed from the permit as follows (This provision will be included as needed in Section D of the permit.)

C.13 **RESERVED** ~~Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

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

Change No. 24 "Emergency Reduction Plans" is updated as follows:

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee ~~prepared and~~ **maintain the most recently** submitted written emergency reduction plans (ERPs) consistent with safe operating procedures ~~on February 13, 1991~~.

(b) Upon direct notification by IDEM-OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Change No. 25 "Response to Excursions or Exceedances" is clarified as follows:

C.17 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(a)~~ Upon detecting an excursion **where a response step is required by the D Section** or **an** exceedance~~, the~~ **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 ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions~~**. The response** may include, but ~~are~~**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 ~~within the indicator range, designated condition, or below the applicable emission limitation~~ **normal** or ~~standard, as applicable~~ **usual manner of operation**.

(c) - (d) ...

(e) The Permittee shall ~~maintain~~ **record** the ~~following records:~~**reasonable response steps taken.**

~~(1) monitoring data;~~

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

~~(3) corrective actions taken.~~

Change No. 26 "Actions Related to Noncompliance Demonstrated by a Stack Test" is clarified as follows:

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall~~ submit a description of ~~these~~ **its** response actions to IDEM, OAQ, ~~within thirty (30~~**no later than seventy-five (75**) days ~~of receipt~~ **after the date** of the test ~~results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented~~.

(b) A retest to demonstrate compliance shall be performed ~~within~~ **no later than** one hundred ~~twenty (120~~**eighty (180**) days ~~of receipt of~~ **after** the ~~original~~ **date of the** test ~~results~~. Should the Permittee demonstrate to IDEM, OAQ**,** that retesting in one hundred ~~twenty (120~~**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.

The response action documents submitted pursuant to this condition do require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

Change No. 27 "Emission Statement" is clarified as follows:

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

~~(a)~~ Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(~~1~~**a**) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(~~2~~**b**) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the "~~**a "**responsible official~~"~~**"** as defined by 326 IAC 2-7-1(34).

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

Change No. 28 "General Record Keeping Requirements" is clarified as follows:

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] ~~[326 IAC 2-2] [326 IAC 2-3]~~

(a) ...

(b) ~~Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~**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) If there is a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:~~

~~(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:~~

~~(A) A description of the project.~~

~~(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.~~

~~(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:~~

~~(i) Baseline actual emissions;~~

~~(ii) Projected actual emissions;~~

~~(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii), and;~~

~~(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.~~

~~(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and~~

~~(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.~~

Change No. 29 "General Reporting Requirements" is clarified as follows:

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] ~~[326 IAC 2-2] [326 IAC 2-3]~~

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported~~.~~ **except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** This report shall be submitted ~~within~~ **not later than** thirty (30) days ~~of~~ **after** the end of the reporting period.~~-~~ The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ **a** certification ~~by~~ **that meets** the **requirements of 326 IAC 2-7-6(1) by a** "responsible official" as defined by 326 IAC 2-7-1(34). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**

(b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~**The address for report submittal is:**

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ**,** on or before the date it is due.

(d) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(e)~~ **The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period.** Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

~~(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C - General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM-OAQ:~~

~~(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements(c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and~~

~~(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements(c)(1)(C)(ii).~~

~~(g) The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:~~

~~(1) The name, address, and telephone number of the major stationary source.~~

~~(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.~~

~~(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).~~

~~(4) Any other information that the Permittee deems fit to include in this report.~~

~~Reports required in this part shall be submitted to:~~

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

~~(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM-OAQ. The general public may request this information from the IDEM-OAQ under 326 IAC 17.1.~~

Change No. 30 "Compliance with 40 CFR 82 and 326 IAC 22-1" is clarified as follows:

C.~~19~~**18** Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~

~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

Change No. 31 IDEM agrees to make the following changes throughout Section D of the permit:

Preventive Maintenance Plan
~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for *this facility and its control devices*.~~ **A Preventive Maintenance Plan (PMP) is required for *each facility and its control device*. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.**

Testing Requirements
... ~~within 180 days of publication of the new or revised condensable PM test method(s) referenced in the U. S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers ($PM_{2.5}$), signed on May 8th, 2008.~~ ... ~~Testing shall be conducted in accordance with Section C – Performance Testing.~~ **Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.**

Visible Emissions Notations
If abnormal emissions are observed, the Permittee shall take reasonable response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~. **Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit. **Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.**

Parametric Monitoring
... the Permittee shall take reasonable response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit. **Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to responding to the reasonable response steps required by this condition.**

Record Keeping Requirements
~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.**

Change No. 32 The Emergency Occurrence Report has been updated as follows:

EMERGENCY OCCURRENCE REPORT

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), ~~within~~ **no later than** four (**4**) **daytime** business hours (1-800-451-6027 or 317-233-0178, ask for Compliance ~~Section~~ **and Enforcement Branch**); and
- The Permittee must submit notice in writing or by facsimile ~~within~~ **no later than** two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

~~A certification is not required for this report.~~

Change No. 33 The Quarterly Deviation and Compliance Monitoring Report has been updated as follows:

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit~~,~~ shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

~~Attach a signed certification to complete this report.~~

Recommendation and Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Source Modification No. 089-30392-00204 and Significant Permit Modification No. 089-30397-00204.

(1) Based on the facts, conditions and evaluations made, OAQ recommends to the IDEM Commissioner that the Significant Source Modification No. 089-30392-00204 and Significant Permit Modification No. 089-30397-00204 be approved.

(2) A copy of the preliminary findings is also available on the Internet at: www.in.gov/idem/permits/air/pending.html.

(3) 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.in.gov/idem/permits/guide/.

IDEM Contact

Questions regarding this proposed permit can be directed to:

Kimberly Cottrell
Indiana Department Environmental Management
Office of Air Quality
100 North Senate Avenue
MC 61-53, Room 1003
Indianapolis, Indiana 46204-2251
Toll free (within Indiana): 1-800-451-6027 extension 3-0870
Or dial directly: (317) 233-0870
kcottrel@idem.in.gov

Please refer to Significant Source Modification No. 089-30392-00204 and Significant Permit Modification No. 089-30397-00204 in all correspondence.

Indiana Department of Environmental Management
Office of Air Quality

Appendix A – Emission Calculations
Technical Support Document (TSD)
Significant Source Modification (SSM) of a Part 70 Source
Significant Permit Modification (SPM) of Part 70 Operating Permit

Source Description and Location

Company Name:	Amsted Rail Company, Inc.
Address City IN Zip:	4831 Hohman Ave., Hammond, IN 46237-1579
County:	Lake
SIC / NAICS Code:	3493 332611
Part 70 Operating Permit No.:	T089-23826-00204
Issuance Date:	February 20, 2009
Significant Source Modification No.:	089-30392-00204
Significant Permit Modification No.:	089-30397-00204
Permit Reviewer:	Kimberly Cottrell
Date:	June 10, 2011

Summary of Potential to Emit

The tables below summarize the potential to emit calculations submitted by Amsted Rail Company, Inc. The subsequent pages of this document contain the calculations provided by Amsted Rail Company, Inc. IDEM has reviewed these calculations and verified their accuracy.

		Source-wide Limited Potential To Emit (ton/yr)						
Process / Emission Unit	**Unit ID**	**CO**	**NO_X**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**VOC**
NEW Shot Peeners	3-1824	0	0	4.34	4.34	4.34	0	0
	3-1825	0	0	4.34	4.34	4.34	0	0
NEW Medium Line Quench Tank	3-2838A	0	0	13.02	13.02	13.02	0	13.02
NEW Medium Line Draw Furnace	2-5097A	0.83	1.96	0.04	0.16	0.16	0.01	0.11
Existing Furnaces		10.95	25.72	0.52	2.08	2.08	0.16	1.51
Exisitng Quench Tanks		0	0	26.05	12.26	12.26	0	12.26
Existing Grinders		0	0	4.34	28.94	4.34	0	0
Existing Shot Peeners		0	0	13.02	0.81	0.81	0	0
Existing Painting Operations		0	0	1.04	1.04	1.04	0	132.00
Totals:		**11.78**	**27.68**	**66.71**	**66.99**	**42.39**	**0.18**	**158.91**

PSD Major Source Threshold	250	250	250	250	NA	250	250
Nonattainment NSR Major Source Threshold	NA	NA	NA	NA	100	NA	NA

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Hammond Public Library

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

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

Applicant Name: **Amsted Rail Company, Inc.**
Permit Number: **089-30397-00204**

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

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

Enclosures
Final Library.dot 11/30/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Larry Moore
Amsted Rail Company, Inc.
4831 Hohman Avenue
Hammond, IN 46327

DATE: August 12, 2011

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

SUBJECT: Final Decision
Title V
089-23826-00204

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
David Sutherland
Tom Rarick, Consultant
OAQ Permits Branch Interested Parties List

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

Mail Code 61-53

IDEM Staff	DPABST 8/12/2011 Amsted Rail Company, Inc. 089-30397-00204 (Final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Larry Moore Amsted Rail Company, Inc. 4831 Hohman Ave Hammond IN 46327-1579 (Source CAATS) (CONFIRM DELIVERY)									
2		David Sutherland Plant Mgr Amsted Rail Company, Inc. 4831 Hohman Ave Hammond IN 46327-1579 *(RO CAATS)*									
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 *(Local Official)*									
4		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 *(Affected Party)*									
5		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 *(Health Department)*									
6		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 *(Affected Party)*									
7		Hammond City Council and Mayors Office 5925 Calumet Avenue Hammond IN 46320 *(Local Official)*									
8		Hammond Public Library 564 State St Hammond IN 46320-1532 *(Library)*									
9		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 *(Affected Party)*									
10		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 *(Affected Party)*									
11		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 *(Affected Party)*									
12		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 *(Affected Party)*									
13		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)									
14		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 *(Affected Party)*									
15		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 *(Local Official)*									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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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		Anthony 2006 E. 140th Street East Chicago IN 46312 (Affected Party)									
2		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 *(Affected Party)*									
3		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 *(Affected Party)*									
4		Tom Rarick Environmental Resources Management (ERM) 11350 N Meridian Suite 320 Carmel IN 46032 *(Consultant)*									
5		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 *(Affected Party)*									
6		Calumet Township Trustee 31 E 5th Avenue Gary IN 46402 *(Affected Party)*									
7		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 *(Affected Party)*									
8		Gary City Council 401 Broadway # 209 Gary IN 46402 *(Local Official)*									
9		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 *(Local Official)*									
10		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 *(Affected Party)*									
11		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 *(Affected Party)*									
12		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 *(Local Official)*									
13		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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