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: July 2, 2012

RE: Amsted Rail Company Inc / 089-31440-00204

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

Enclosures
FNPER.dot12/03/07

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

July 2,2012

Robert Ribbing
Amsted Rail Company, Inc.
1700 Walnut Street
Granite City, Illinois 62040

Re: 089-31440-00204
Significant Source Modification to
Part 70 Renewal No.: T089-23826-00204

Dear Mr. Ribbing:

On February 6, 2012, the Office of Air Quality (OAQ) received an application from the Amsted Rail Company located at 4831 Hohman Avenue, Hammond, Indiana 46327-1579, for a significant source modification. Amsted Rail Company applied to modify its Coil Spring Manufacturing Process by adding a fourth manufacturing line (Line 4), rated at 5.25 tons of product per hour and consisting of the following:

1) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes an oil quench tank, identified as 3-4000, approved for construction in 2012, using an oil smoke filter, identified as 3-4001, 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, approved for construction in 2011, 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) Two (2) Coil Spring Coating Dip Tanks, for application of rust preventative coatings, which include the following:

Unit ID	Coating
3-2874A	Water-based Clear Coating
3-2874B	Water-based Clear Coating

3) 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 Heat Input (MMBtu/hr)
2-5201	Line 4 Slot Furnace	1.25
2-5202	Line 4 Slot Furnace	1.25
2-5203A	Bar Furnace	6.50
2-5203B	Bar Furnace	6.50

4) One (1) Shot Peener, identified as 3-1826, approved for construction in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826, for particulate matter control, and exhausting to Stack 26.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13 17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period eighteen (18) months or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l), the emission units constructed under this proposal shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 David Matousek, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for David Matousek or extension (2-8253), or dial (317) 232-8253.

Sincerely,

Tripurari Sinha

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

Attachments:

DJM

cc: File-Lake County
Lake County Health Department
U.S. EPA, Region V
Air Compliance and Enforcement Branch

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

Significant Source Modification to a Part 70 Source

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.

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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 089-31440-00204	
Issued by: Tripurari Sinha Tripurari Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 2, 2012

TABLE OF CONTENTS

A. SOURCE SUMMARY

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]
A.4 Other Insignificant Activities [326 IAC 2-7-1(21)]
A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

B. GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]
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)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-7-7]
B.5 Severability [326 IAC 2-7-5(5)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]
B.11 Emergency Provisions [326 IAC 2-7-16]
B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]
B.14 Termination of Right to Operate [326 IAC 2-7-10] [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]
B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]
B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]
B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
B.21 Source Modification Requirement [326 IAC 2-7-10.5]
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]
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]
B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS

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

C.1 Opacity [326 IAC 5-1]
C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.4 Fugitive Dust Emissions [326 IAC 6-4]
C.5 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]
C.6 Lake County: Particulate Matter Contingency Measures [326 IAC 6.8-11]
C.7 Stack Height [326 IAC 1-7]
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)]
C.9 Performance Testing [326 IAC 3-6]

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

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)][40 CFR 64][326 IAC 3-8]
C.12 Continuous Compliance Plan [326 IAC 6.8-8-1][326 IAC 6.8-8]
C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.15 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]
C.16 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.18 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]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

Stratospheric Ozone Protection
C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION 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]

D.2. EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Particulate Matter Limitations for Lake County [326 IAC 6.8]
D.2.2 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2-4]
D.2.3 PSD Minor Limits [326 IAC 2-2]
D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements
D.2.5 Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]
D.2.6 Broken or Failed Bag Detection – Single Compartment Baghouse
D.2.7 Testing Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]
D.2.8 Visible Emissions Notations
D.2.9 Parametric Monitoring (Dust Collector)
D.2.10 Broken or Failed Bag Detection – Multi-Compartment Baghouse

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.11 Record Keeping Requirement

D.3. EMISSIONS UNIT OPERATION CONDITIONS

D.3.1 Particulate Matter less than 10 microns in diameter (PM_{10}) [326 IAC 6.8-2]
D.3.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]
D.3.3 PSD Minor Limits [326 IAC 2-2]
D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]
D.3.5 Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5] [40 CFR 64]
D.3.6 Testing Requirements [326 IAC 2-1.1-11] [40 CFR 64]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)] [40 CFR 64]
D.3.7 Visible Emissions Notations [40 CFR 64]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 64]
D.3.8 Record Keeping Requirements [40 CFR 64]

D.4. EMISSIONS UNIT OPERATION 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]
D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements
D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2]
D.4.4 Particulate Matter (PM) [326 IAC 2-7-6]
D.4.5 Particulate Emission Limitations [326 IAC 6-3-2]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.4.6 Record Keeping Requirement

D.5. EMISSIONS UNIT OPERATION 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]
D.5.2 PSD Minor Limits [326 IAC 2-2]

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.5.4 Record Keeping Requirements

D.6. EMISSIONS UNIT OPERATION 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]
D.6.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

D.7. EMISSIONS UNIT OPERATION 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]
D.7.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]
D.7.3 PSD Minor Limits [326 IAC 2-2]
D.7.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

D.7.5 Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]
D.7.6 Testing Requirements [326 IAC 2-1.1-11]

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

D.7.7 Visible Emissions Notations
D.7.8 Broken or Failed Bag Detection – Multi-Compartment Baghouse

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

D.7.9 Record Keeping Requirements

D.8. EMISSIONS UNIT OPERATION CONDITIONS

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

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

Compliance Determination Requirements

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

Certification

Emergency Occurrence Report

Quarterly Report

Quarterly Deviation and Compliance Monitoring Report

Attachment A: Fugitive Dust Control Plan

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(14)] [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:	(618) 225-6419
SIC Code:	3493
County Location:	Lake
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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(14)]

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 oil smoke filter, 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 an oil smoke 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 2-5097, permitted in 2011, with a maximum design capacity of 5.1 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 or an oil smoke filter, 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.

(4) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes an oil quench tank, identified as 3-4000, approved for construction in 2012, using an oil smoke filter, identified as 3-4001, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. This process also includes a natural gas-fired draw furnace, identified as 2-5097A, approved for construction 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.

(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 wall as 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
3-2874A	Water-based Clear Coating
3-2874B	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(14)]

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
2-5201	Line 4 Slot Furnace	1.25
2-5202	Line 4 Slot Furnace	1.25
2-5203A	Line 4 Bar Furnace	6.5
2-5203B	Line 4 Bar Furnace	6.5

(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.

(6) One (1) Shot Peener, identified as 3-1826, approved for construction in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826A, for particulate matter control, and exhausting to Stack 26.

(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 6.8]

A.4 Other Insignificant Activities [326 IAC 2-7-1(21)]

This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) 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)].

(b) 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)].

(c) 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)].

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

(e) 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.5 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]

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.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) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

The submittal by the Permittee does require 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(12)] [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)(8) 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(21) and 326 IAC 2-7-1(40). 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) or (c) 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) or (c). 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) and (c)(1).

(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 Particulate Matter 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, included as Attachment A.

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)][40 CFR 64][326 IAC 3-8]

(a) 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.

(b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.12 Continuous Compliance Plan [326 IAC 6.8-8-1][326 IAC 6.8-8-8]

(a) Pursuant to 326 IAC 6.8-8-1, the source (Amsted Rail Company, Inc.) shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The source (Amsted Rail Company, Inc.) shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.

(b) Pursuant to 326 IAC 6.8-8-8, the source (Amsted Rail Company, Inc.) shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The source (Amsted Rail Company, Inc.) shall submit the updated CCP, if required to IDEM, OAQ within thirty (30) days of the update.

(c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

C.13 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall 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.15 Risk Management Plan [326 IAC 2-7-5(11)] [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.16 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8] [326 IAC 2-7-5][326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation, not subject to CAM, 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.

(II)

(a) CAM Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. 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). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) CAM recordkeeping requirements.

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

C.17 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.18 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:

(1) starting in 2013 and every three (3) years thereafter, and

(2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

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

(2) 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 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 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. Support information includes the following:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64] [326 IAC 3-8]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of this paragraph. 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.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(b) 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) 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.21 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(14)]:

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(14)]: 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, PM_{10} and $PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99	2.085	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		1.89	
Vertical Opposing Disc Grinder	3-0397		2.64	

Compliance with these limits combined with the limits in Conditions D.3.3, D.5.2, and D.7.3, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan (PMP) is required for these facilities and their associated control device. 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.2.5 Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]

In order to comply with Conditions D.2.1, D.2.2 and D.2.3, 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.

D.2.6 Broken or Failed Bag Detection – Single Compartment Baghouse

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

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the 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, dust traces or triboflows.

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 the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). 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 exhaust 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 and Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.

D.2.9 Parametric Monitoring (Dust Collector)

(a) The Permittee shall record the 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, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. 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 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 or replaced at least once every six (6) months.

D.2.10 Broken or Failed Bag Detection – Multi-Compartment Baghouse

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.

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 the compliance status 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 the compliance status 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 the compliance status 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(14)]: 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 oil smoke filter 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 an oil smoke 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 2-5097, permitted in 2011, with a maximum design capacity of 5.1 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 or oil smoke filter, 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.

(4) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes an oil quench tank, identified as 3-4000, approved for construction in 2012, using an oil smoke filter, identified as 3-4001, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. This process also includes a natural gas-fired draw furnace, identified as 2-5097A, approved for construction 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.

(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]

(a) 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	1.05
Large Line Coil Spring Manufacturing Process	1.75

(b) Pursuant to 326 IAC 6.8-2-4(b), (Lake County: PM10 and total suspended particulates (TSP) emissions), the small line draw furnace (2-5163) and the large line draw furnace (3-5164) shall fire natural gas only.

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) from the oil quench tank, identified as 3-2838A, natural gas draw furnace, identified as 2-5097, the oil quench tank, identified as 3-4000 and the medium line draw furnace, identified as 2-5097A, shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.3.3 PSD Minor Limits [326 IAC 2-2]

PM, PM_{10} and $PM_{2.5}$ emissions shall be limited as follows:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Small Line Quench Tank	3-2821	2.97	1.05	1.05
Medium Line Quench Tank	3-2838A	2.97	2.97	2.97
Large Line Quench Tank	3-2845	2.97	1.75	1.75
Line 4 Quench Tank	3-4000	3.09	3.09	3.09

Compliance with these limits combined with the limits in Conditions D.2.3, D.5.2 and D.7.3, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

(a) In order to ensure compliance with Conditions D.3.1 and D.3.3, the electrostatic precipitators or oil smoke filter for PM, PM_{10}, and $PM_{2.5}$ control shall be in operation and controlling emissions at all times when the Large Line Coil Spring Manufacturing Process is in operation.

(b) In order to ensure compliance with Conditions D.3.1, D.3.2 and D.3.3, the oil smoke filter for PM, PM_{10}, $PM_{2.5}$ control shall be in operation and controlling emissions at all times when the Small Line Coil Spring Manufacturing Process or Medium Line Coil Spring Manufacturing Process is in operation.

(c) In order to ensure compliance with Conditions D.3.2 and D.3.3, the oil smoke filter for PM, PM10 and PM2.5 control shall be in operation and controlling emissions at all times the Line 4 Coil Spring Manufacturing Process is in operation.

D.3.6 Testing Requirements [326 IAC 2-1.1-11] [40 CFR 64]

(a) In order to demonstrate the compliance status with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing of the oil smoke filter controlling the oil quench tank (3-2838A) associated with the Medium Line Coil Spring Manufacturing Process no later than one hundred eighty (180) days after the start of operation of the Medium Line Coil Spring Manufacturing Process, utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate the compliance status with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing of the oil smoke filter 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 no later than three hundred sixty-five (365) days of issuance of SPM No. 089-30862-00204, utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Conditions D.3.2 and D.3.3 and within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM10 and PM2.5 testing on the oil smoke filter controlling emissions from the Line 4 quench tank, utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.3.7 Visible Emissions Notations [40 CFR 64]

(a) Visible Emissions Notations:

(1) Visible emission notations of the stack exhaust for the Large Line Coil Spring Manufacturing Process shall be performed at least once per day during normal daylight operations. [40 CFR 64]

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

(4) Visible emission notations of the stack exhaust for the Line 4 quench tank shall be performed at least once per day during normal daylight operations. [40 CFR 64]

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 and Exceedances contains the Permittee's obligations with regard 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] [40 CFR 64]

D.3.8 Record Keeping Requirements [40 CFR 64]

(a) In order to document the compliance status with Condition D.3.7(a)(3), the Permittee shall maintain daily records of visible emission notations of the Small Line quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.)

(b) In order to document the compliance status with Condition D.3.7(a)(2), the Permittee shall maintain daily records of visible emission notations of the Medium Line quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.)

(c) In order to document the compliance status with Condition D.3.7(a)(1), the Permittee shall maintain daily records of visible emission notations of the Large Line quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.) [40 CFR 64]

(d) In order to document the compliance status with Condition D.3.7(a)(4), the Permittee shall maintain daily records of visible emission notations of the Line 4 quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.) [40 CFR 64]

(e) Section C - General Record Keeping 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(14)]:

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(12)]

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

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 reserves 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.

D.4.5 Particulate Emission Limitations [326 IAC 6-3-2]

In accordance with 326 IAC 6-3-2(d)(1), the Permittee shall operate the dry filters in accordance with manufacturer's recommendations.

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 the compliance status 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) 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(14)]: 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
3-2874A	Water-based Clear Coating
3-2874B	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 Limits [326 IAC 2-2]

VOC emissions shall be limited to:

Emission Unit	ID	VOC Limit (ton/yr)
Dip Coating	3-2813	80.81
Dip Coating	3-2865	
Dip Coating	3-2865A	
Dip Coating	3-2867	
Dip Coating	3-2870	
Dip Coating	3-2874A	
Dip Coating	3-2874B	
Dip Coating	3-2869	55.19
Dip Coating	3-2872	
Dip Coating	3-2873	

Compliance with these limits combined with the limits in Conditions D.2.3, D.3.3 and D.7.3, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

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 the compliance status 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(14)]:

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
2-5201	Line 4 Slot Furnace	1.25
2-5202	Line 4 Slot Furnace	1.25
2-5203A	Line 4 Bar Furnace	6.5
2-5203B	Line 4 Bar Furnace	6.5

(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) and Large Line Slot Furnace (2-5036) 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 Line 4 Slot Furnace (2-5201), Line 4 Slot Furnace (2-5202), Line 4 Bar Furnace (2-5203A) and Line 4 Bar Furnace (2-5203B), 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(14)]:

(a) 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.

(6) One (1) Shot Peener, identified as 3-1826, approved for construction in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826A, for particulate matter control, and exhausting to Stack 26.

(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), Shot Peener (3-1825) and Shot Peener (3-1826) 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, PM_{10} and $PM_{2.5}$ shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Shot Peener	3-1804	0.99	0.06	0.06
Shot Peener	3-1821	0.99	0.06	0.06
Shot Peener	3-1823	0.99	0.06	0.06
Shot Peener	3-1824	0.99	0.99	0.99
Shot Peener	3-1825	0.99	0.99	0.99
Shot Peener	3-1826	1.03	1.03	1.03

Compliance with these limits combined with the limits in Conditions D.2.3, D.3.3 and D.5.2, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

D.7.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

In order to comply with Conditions D.7.1, D.7.2 and D.7.3, the control devices for PM, PM_{10}, and $PM_{2.5}$ control shall be in operation and controlling emissions from their associated facilities at all times that the facilities are in operation.

D.7.6 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate the compliance status with Conditions D.7.2 and D.7.3, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on one of the baghouses controlling Shot Peener (3-1824) or Shot Peener (3-1825) no later than one hundred eighty (180) days after the start of operation of each Shot Peener, utilizing methods approved by the Commissioner. Repeat testing on shot peeners 3-1824, 3-1825, 3-1804, 3-1821, 3-1823 and 3-1826 shall be conducted on at least two (2) of the shot peeners every five (5) years. Testing shall be conducted in a manner to ensure the time period between tests on each unit does not exceed fifteen (15) years. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate the compliance status with Conditions D.7.1 and D.7.3, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on one of the baghouses controlling Shot Peener (3-1804), Shot Peener (3-1821), or Shot Peener (3-1823) no later than three hundred sixty-five (365) days of issuance of SPM No. 089-30862-00204, utilizing methods approved by the Commissioner. Repeat testing on shot peeners 3-1824, 3-1825, 3-1804, 3-1821, 3-1823 and 3-1826 shall be conducted on at least two (2) of the shot peeners every five (5) years. Testing shall be conducted in a manner to ensure the time period between tests on each unit does not exceed fifteen (15) years. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling

Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Condition D.7.2 and Condition D.7.3, and within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM10 and PM2.5 testing on the shot peener 3-1826, exhausting to Stack 26, utilizing methods approved by the Commissioner. Repeat testing on shot peeners 3-1824, 3-1825, 3-1804, 3-1821, 3-1823 and 3-1826 shall be conducted on at least two (2) of the shot peeners every five (5) years. Testing shall be conducted in a manner to ensure the time period between tests on each unit does not exceed fifteen (15) years. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.7.7 Visible Emissions Notations

(a) Visible emission notations of the stack exhausts for Shot Peeners 3-1804, 3-1821, 3-1823, 3-1824, 3-1825 and 3-1826 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 and Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.

D.7.8 Broken or Failed Bag Detection – Multi-Compartment Baghouse

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.

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

D.7.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.7.7, the Permittee shall maintain daily records of visible emission notations of the baghouse stack exhausts of Shot Peeners 3-1804, 3-1821, 3-1824, 3-1825 and 3-1826. 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) 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(14)]:

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.

(c) 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)

- For each emergency lasting one (1) hour or more, 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
- For each emergency lasting one (1) hour or more, 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 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. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C – General Reporting. 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: _____

ATTACHMENT A - SPM No. 089-30862-00204

ASF-Keystone, Inc.

4831 HOHMAN AVENUE * HAMMOND, IN 46327
(219) 931-1900 * (219) 931-5349 (FAX)

October 25, 2002

Mr. Lito Biscocho, Engineer
Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue
Hammond, IN 46320

RE: PART 70 OPERATING PERMIT NO. T089-8273-00204 – FUGITIVE DUST CONTROL PLAN; EMERGENCY REDUCTION PLAN

Mr. Biscocho:

Pursuant to Section C.5 ("Fugitive Dust Emissions") and Section C.17 ("Emergency Reduction Plans") of the permit referenced above, ASF-Keystone, Inc. is enclosing the required Plans.

Should you have any questions or concerns, please call Bob Wille at 931-1900, extension 225, or e-mail him at rwille@asfglobal.com. Thank you.

Sincerely,

G.H. Radermacher
Superintendent

OCT 2 5 2002

encl.

GHR:RW

c: GA (w/o encl.)

ATTACHMENT A - SPM No. 089-30862-00204

ASF-KEYSTONE, INC.
4831 Hohman Ave.
Hammond, IN 46327

FUGITIVE DUST CONTROL PLAN
pursuant to
326 IAC 6-1-11.1
and required by Sections C.4 and C.5 of
Part 70 Operating Permit No T089-8273-00204

October 29, 2002

ATTACHMENT A - SPM No. 089-30862-00204

PLANT CONTACTS:	POSITION	PHONE
G.H. Radermacher	Plant Superintendent	219-931-1900, x234
D.L. Winiecki	Production Manager	219-931-1900, x221
R.D. Blanton	Maintenance Manager	219-931-1900, x215
R.S. Wille	Customer Service	219-931-1900, x225

A) Name and Address of Source:
ASF-Keystone, Inc.
4831 Hohman Ave.
Hammond, IN 46327

B) Name and Address of Source Owner:
ASF-Keystone, Inc.
1700 Walnut St.
Granite City, IL 62040

C) Applicable Operations (with Permit Section References)

1) Paved Roads - C.5(a)
All roadways within the boundaries of ASF-Keystone are paved. The current configuration of the roadways within the plant proper, along with plant rules, limit speed to 5 miles per hour.

2) Unpaved Roads – C.5(b)
There exist no unpaved roads within the boundaries of ASF-Keystone.

3) Batch Transfer – C.5(c)
ASF-Keystone has no facility or operation in which batch transfer takes place.

4) Transfer Of Material Onto And Out Of Storage Piles – C.5(d)
ASF-Keystone employs a concrete pad, near the east end of the property, for temporary storage of special (non-hazardous) waste. The waste is periodically transferred by payloader to a twenty-cubic-yard box, immediately adjacent to the pad. The waste is composed steel scale, too heavy to become airborne, and dust from grinding and shotpeening operations. The dust is stored in bags.

5) Storage Piles – C.5(e)
Please see number 4 above.

6) Inplant Transportation Of Material By Truck Or Rail – C.5(f)
While ASF-Keystone engages in transportation of material inplant, neither the material, the roadway, nor the vehicle used produce visible fugitive dust. There are no rail operations.

7) Inplant Transportation of Material by Front-end Loaders and Skip Hoists – C.5(g)
ASF-Keystone has no operation involving inplant transportation of material by front-end loaders and/or skip hoists.

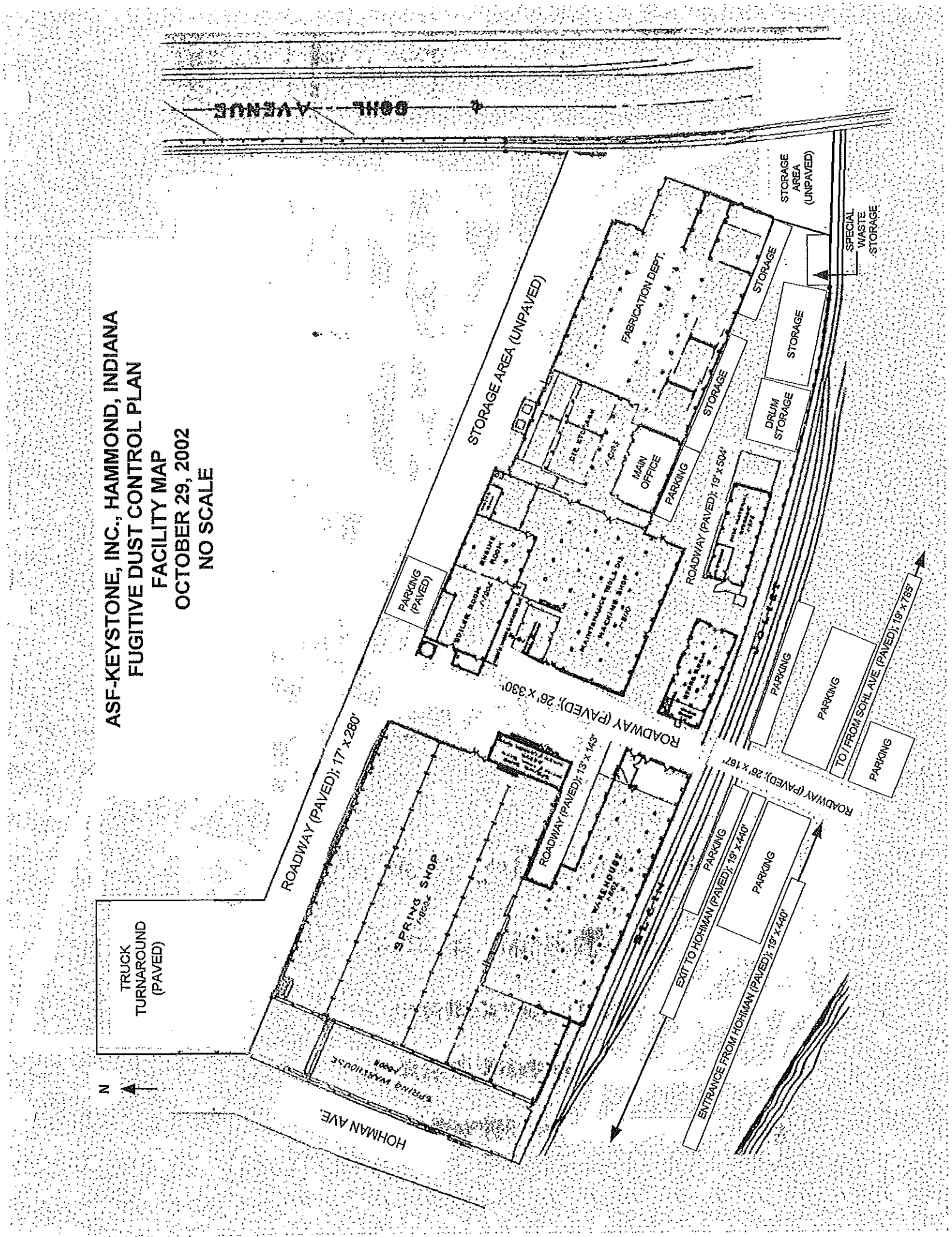
8) Building Enclosing All Or Part Of The Material Processing Equipment – C.5(h)
ASF-Keystone recognizes a potential for fugitive emissions from its electrostatic precipitators. This potential will be addressed by compliance with the visible emissions notation and compliance response requirements of the Permit (Sections D.4.5, D.5.5, D.6.5).

9) PM_{10} Emissions from Building Vents – C.5(i)
Please see number 8 above.

10) Dust Handling Equipment – C.5(j)
All dust created by grinding and shotpeening is confined to bags. The bags are transported to the concrete pad for temporary storage of special waste.

11) Any Facility or Operation not Specified in 326 IAC 6-1-11.1(d)
ASF-Keystone does not have any other facility or operation, other than those specified in numbers 1 through 10 above, that have the potential for producing fugitive dust emissions.

ATTACHMENT A - SPM No. 089-30862-00204



ATTACHMENT A - SPM No. 089-30862-00204

ASF-KEYSTONE, INC.
4831 Hohman Ave.
Hammond, IN 46327

EMERGENCY REDUCTION PLAN

pursuant to
326 IAC 1-5-2 and 326 IAC 1-5-3
and required by Section C.17 of
Part 70 Operating Permit No T089-8273-00204

October 29, 2002

ATTACHMENT A - SPM No. 089-30862-00204

PLANT CONTACTS:	POSITION	PHONE
G.H. Radermacher	Plant Superintendent	219-931-1900, x234
D.L. Winiecki	Production Manager	219-931-1900, x221
R.D. Blanton	Maintenance Manager	219-931-1900, x215
R.S. Wille	Customer Service	219-931-1900, x225

ACTION PLAN FOR TOTAL SUSPENDED PARTICULATE (TSP):

FORECAST: Notify all department managers whose requirement use may be affected by steps taken in alert, warning, and emergency levels of air pollution episode.

ALERT:
1) Notify all department managers of alert level of air pollution episode.
2) At present, all production furnaces, space heating requirements, and hot water heaters are fired by natural gas.
3) All grinders and shot peeners have dust collection.

EMISSION REDUCTION ESTIMATE: 98%

WARNING:
1) Notify all department managers of warning level of air pollution episode.
2) Prepare to stop all production that is a source of particulate emissions.
3) Continue use of natural gas-fired equipment.

EMISSION REDUCTION ESTIMATE: 98%

EMERGENCY:
1) Notify all department managers of emergency level of air pollution episode.
2) Stop all production that is a source of particulate emissions.
3) Limit the use of gas-fired space heating equipment to critical production operations only.
4) Dismiss all non-essential and affected employees for the duration of the episode.

EMISSION REDUCTION ESTIMATE: 100%

ACTION PLAN FOR SULFUR OXIDES AS SULFUR DIOXIDE (SO_2):

FORECAST: To the best of our knowledge, ASF-Keystone is a non-significant source of SO_2. Therefore, action will be limited to the emergency level.

ALERT: None

EMISSION REDUCTION ESTIMATE: 0%

WARNING: None

EMISSION REDUCTION ESTIMATE: 0%

EMERGENCY:
1) Notify all department managers of emergency level of air pollution episode.
2) Stop all production that is a possible source of SO_2 emissions.
3) Limit the use of gas-fired space heating equipment to allowable production operations only.
3) Dismiss all non-essential and affected employees for the duration of the episode.

EMISSION REDUCTION ESTIMATE: 99%

ACTION PLAN FOR CARBON MONOXIDE (CO):

FORECAST: To the best of our knowledge, ASF-Keystone is a non-significant source of CO. Therefore, action will be limited to the emergency level.

ALERT: None

EMISSION REDUCTION ESTIMATE: 0%

WARNING: None

EMISSION REDUCTION ESTIMATE: 0%

EMERGENCY:
1) Notify all department managers of emergency level of air pollution episode.
2) Stop all production that is a possible source of CO emissions.
3) Limit the use of gas-fired space heating equipment to allowable production operations only.
3) Dismiss all non-essential and affected employees for the duration of the episode.

EMISSION REDUCTION ESTIMATE: 99%

ACTION PLAN FOR OZONE (O_2):

FORECAST: To the best of our knowledge, ASF-Keystone is a non-significant source of ozone. Therefore, action will be limited to the emergency level.

ALERT: None

EMISSION REDUCTION ESTIMATE: 0%

WARNING: None

EMISSION REDUCTION ESTIMATE: 0%

EMERGENCY:
1) Notify all department managers of emergency level of air pollution episode.
2) Stop all production that is a possible source of ozone emissions.
3) Limit the use of gas-fired space heating equipment to allowable production operations only.
3) Dismiss all non-essential and affected employees for the duration of the episode.

EMISSION REDUCTION ESTIMATE: 99%

ACTION PLAN FOR NITROGEN DIOXIDE (NO_2):

FORECAST: To the best of our knowledge, ASF-Keystone is a non-significant source of NO_2. Therefore, action will be limited to the emergency level.

ALERT: None

EMISSION REDUCTION ESTIMATE: 0%

WARNING: None

EMISSION REDUCTION ESTIMATE: 0%

EMERGENCY:
1) Notify all department managers of emergency level of air pollution episode.
2) Stop all production that is a possible source of NO_2 emissions.
3) Limit the use of gas-fired space heating equipment to allowable production operations only.
3) Dismiss all non-essential and affected employees for the duration of the episode.

EMISSION REDUCTION ESTIMATE: 99%

ACTION PLAN FOR LEAD:

FORECAST: To the best of our knowledge, ASF-Keystone is a non-significant source of lead. Therefore, action will be limited to the emergency level.

ALERT: None

EMISSION REDUCTION ESTIMATE: 0%

WARNING: None

EMISSION REDUCTION ESTIMATE: 0%

EMERGENCY:
1) Notify all department managers of emergency level of air pollution episode.
2) Stop all production that is a possible source of lead emissions.
3) Limit the use of gas-fired space heating equipment to allowable production operations only.
3) Dismiss all non-essential and affected employees for the duration of the episode.

EMISSION REDUCTION ESTIMATE: 99%

ACTION PLAN FOR PM_{10}:

FORECAST: Notify all department managers whose requirement use may be affected by steps taken in alert, warning, and emergency levels of air pollution episode.

ALERT:
1) Notify all department managers of alert level of air pollution episode.
2) At present, all production furnaces, space heating requirements, and hot water heaters are fired by natural gas.
3) All grinders and shot peeners have dust collection.

EMISSION REDUCTION ESTIMATE: 98%

WARNING:
1) Notify all department managers of warning level of air pollution episode.
2) Prepare to stop all production that is a source of particulate emissions.
3) Continue use of natural gas-fired equipment.

EMISSION REDUCTION ESTIMATE: 98%

EMERGENCY:
1) Notify all department managers of emergency level of air pollution episode.
2) Stop all production that is a source of particulate emissions.
3) Limit the use of gas-fired space heating equipment to critical production operations only.
4) Dismiss all non-essential and affected employees for the duration of the episode.

EMISSION REDUCTION ESTIMATE: 100%

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Amsted Rail Company, Inc.
Source Location:	4831 Hohman Avenue, Hammond, Indiana 46327
County:	Lake County
SIC Code:	3493
Operation Permit No.:	T 089-23826-00204
Operation Permit Issuance Date:	February 20, 2009
Significant Source Modification No.:	089-31440-00204
Significant Permit Modification No.:	089-31498-00204
Permit Reviewer:	David Matousek

Public Notice Information

On May 29, 2012, the Office of Air Quality (OAQ) had a notice published in the Post Tribune in Munster, Indiana and the Times in Merrillville, Indiana stating that Amsted Rail Company, Inc., located at 4831 Hohman Avenue, Hammond, Indiana 46327 submitted an application for a significant modification of its Part 70 Operating Permit Renewal issued on February 20, 2009. The notice stated that Amsted Rail Company, Inc. applied to construct a fourth coil spring manufacturing line, identified as Line 4. Line 4 consists of a coil spring manufacturing process with a quench tank, two dip tanks, two slot furnaces, two bar furnaces and a shot peener. Additionally, the source will reinstate draw furnace 2-5097 on the medium coil spring line. The notice also stated that the OAQ proposed to issue a Part 70 Significant Source Modification and a Significant Permit Modification for this project. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not these permits should be issued as proposed.

Comments and IDEM's Responses

On June 25, 2012, Debra Malone, Chief Engineer, Hammond Department of Environmental Management (HDEM) submitted comments to IDEM, OAQ during the public comment period. IDEM address the comments below and details changes made to the draft permit document as a result of these comments. The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD.

Modification No. 1: Please revise the table of contents and Condition D.5.2 to the plural tense.

IDEM RESPONSE IDEM does not object and has made the following changes to the draft permit:

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

****

Modification No. 2: Please revise the table of contents and Condition D.7.3 to the plural tense.

IDEM RESPONSE IDEM does not object and has made the following changes to the draft permit:

D.7.3 PSD Minor Limit**s** [326 IAC 2-2]

****

Modification No. 3: Please fix the typographical error in Condition C.12.

IDEM RESPONSE IDEM does not object and has made the following changes to the draft permit:

C.12 Continuous Compliance Plan [326 IAC 6.8-8-1][326 IAC 6.8-8-8]

(a) Pursuant to ~~326 IAC~~ 326 IAC 6.8-8-1, the source (Amsted Rail Company, Inc.) shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The source (Amsted Rail Company, Inc.) shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.

****

Modification No. 4: What is the quality improvement plan (QIP) in Condition C.16 under (ii)(c)?

IDEM RESPONSE A quality improvement plan is a written plan that outlines the procedures that will be used to evaluate problems that affect the performance of control equipment. A QIP is authorized under 40 CFR 64 (CAM) and can be required by permitting authorities for sources that have failed to adequately respond to past excursions or exceedances.

No changes to the draft permit are required as a result of this comment.

Modification No. 5: The proposed changes section of the TSD and Condition D.3.3 show different PM10 and PM2.5 limits for the Line 4 Quench Tank. Which is correct?

IDEM RESPONSE Permit Condition D.3.3 is correct. The PM10 and PM2.5 limits shown on pages 5 and 26 of 38 of the technical support document (TSD) for the Line 4 Quench Tank are incorrect. The incorrect portion of the TSD is shown below:

Page 5 of 38 of the TSD

****

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Small Line Quench Tank	3-2821	2.97	1.05	1.05
**********				
Line 4 Quench Tank	3-4000	3.09	~~3.40~~ **3.09**	~~2.26~~ **3.09**

****

Page 26 of 38 of the TSD

****

PM, PM_{10} and $PM_{2.5}$ emissions shall be limited as follows:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Small Line Quench Tank	**3-2821**	**2.97**	**1.05**	**1.05**
**********				
Line 4 Quench Tank	**3-4000**	**3.09**	**~~3.40~~ 3.09**	**~~2.26~~ 3.09**

****

No changes to the draft permit are required as a result of this comment. IDEM uses the TSD for historical purposes and the TSD will not be updated.

Modification No. 6: Please remove the comma between PM2.5 and testing in Conditions D.3.6(a) and (b)

IDEM RESPONSE IDEM does not object and has made the following changes to the draft permit:

D.3.6 Testing Requirements [326 IAC 2-1.1-11] [40 CFR 64]

(a) In order to demonstrate the compliance status with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$~~,~~ testing of **********

(b) In order to demonstrate the compliance status with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$~~,~~ testing **********

Modification No. 7: Please remove the reference to Condition D.3.4 in Conditions D.5.2 and D.7.3. It is incorrect.

IDEM RESPONSE IDEM agrees the condition reference is incorrect and has made the following changes to the draft permit:

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

****

Compliance with these limits combined with the limits in Conditions D.2.3, D.3.3~~, D.3.4~~ and D.7.3, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

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

****

Compliance with these limits combined with the limits in Conditions D.2.3, D.3.3~~, D.3.4~~ and D.5.2, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

Modification No. 8: Please fix the typographical error in the facility description box in Section D.7.

IDEM RESPONSE IDEM does not object and has made the following changes to the draft permit:

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

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

****

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

Modification No. 9: Please fix the typographical error in Condition D.8.1(c).

IDEM RESPONSE IDEM does not object and has made the following changes to the draft permit:

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

(a) **********

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

Modification No. 10: The source address is incorrect on all of the reporting forms. The correct address is 4831, Homan Avenue, Hammond, Indiana 46327.

IDEM RESPONSE IDEM agrees and has revised the address on the reporting forms. A sample change to the permit as a result of this comment is shown below:

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

IDEM Contact

(a) Questions regarding this proposed permit can be directed to David Matousek at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8253 or toll free at 1-800-451-6027 extension 2-8253.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Amsted Rail Company, Inc.
Source Location:	4831 Hohman Avenue, Hammond, Indiana 46327
County:	Lake County
SIC Code:	3493
Operation Permit No.:	T 089-23826-00204
Operation Permit Issuance Date:	February 20, 2009
Significant Source Modification No.:	089-31440-00204
Significant Permit Modification No.:	089-31498-00204
Permit Reviewer:	David Matousek

Existing Approvals

The source was issued Part 70 Operating Permit No. T089-23826-00204 on February 20, 2009. The source has since received the following approvals:

(a) Administrative Amendment No. 089-27976-00204, issued on May 28, 2009;
(b) Significant Source Modification No. 089-30392-00204, issued on July 22, 2011;
(c) Significant Permit Modification No. 089-30397-00204, issued on August 12, 2011;
(d) Administrative Amendment No. 089-30909-00204, issued on September 22, 2011;
(e) Significant Permit Modification No. 089-30862-00204, issued on January 4, 2012;
(f) Administrative Amendment No. 089-31340-00204, issued on January 17, 2012; and
(g) Interim Significant Source Modification No. 089-31440I-00204, issued on March 30, 2012.

County Attainment Status

The source is located in Lake County.

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.
Unclassifiable or attainment effective February 6, 2012, for PM2.5.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Lake County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Lake County has been classified as attainment for $PM_{2.5.}$ On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. On February 1, 2012, the air pollution control board issued an extension of an emergency order, initially issued on November 2, 2012, to temporarily amend 326 IAC 1-4 to add the federal redesignations for Lake County and Porter County to attainment of the 1997 annual fine particulate matter (PM2.5). Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Lake County has been classified as attainment or unclassifiable in Indiana 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.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Amsted Rail Company, Inc. on February 6, 2012, relating to the construction of a fourth coil spring manufacturing line, identified as Line 4. The line consists of a coil spring manufacturing process with a quench tank, two dip tanks, two slot furnaces, two bar furnaces and a shot peener. The source intends to reinstate draw furnace 2-5097 on the medium coil spring line.

The following is a list of the proposed emission unit(s) and pollution control device(s):

1) One (1) natural gas-fired draw furnace, identified as 2-5097, permitted in 2011, with a maximum design capacity of 5.1 MMBtu/hr heat input. This unit will be incorporated into the emission unit description of the medium coil spring line.

2) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes an oil quench tank, identified as 3-4000, approved for construction in 2012, using an oil smoke filter, identified as 3-4001, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. This process also includes a natural gas-fired draw furnace, identified as 2-5097A, approved for construction in 2011, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress relieve the newly coiled springs after the quench operation.

3) Two (2) Coil Spring Coating Dip Tanks, for application of rust preventative coatings, which include the following:

Unit ID	Coating
3-2874A	Water-based Clear Coating
3-2874B	Water-based Clear Coating

4) 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 Heat Input (MMBtu/hr)
2-5201	Line 4 Slot Furnace	1.25
2-5202	Line 4 Slot Furnace	1.25
2-5203A	Bar Furnace	6.50
2-5203B	Bar Furnace	6.50

5) One (1) Shot Peener, identified as 3-1826, approved for construction in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826A, for particulate matter control, and exhausting to Stack 26.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

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.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	552.05
PM_{10}	200.73
$PM_{2.5}$	200.73
SO_2	0.06
VOC	6.48
CO	7.42
NO_X	8.85
Single HAPs	< 10
Total HAPs	< 25

This source modification is subject to 326 IAC 2-7-10.5(f)(4)(A), because the modification has a potential to emit greater than or equal to twenty-five (25) tons per year of particulate matter (PM) or PM10.

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)(1), because the modification includes a case-by-case determination of an emission limit or other standard.

Permit Level Determination – PSD

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 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Limited Potential to Emit of the Modification (TPY)										
Process / Emission Unit	**PM**	**PM10**	**PM2.5**	**SO2**	**VOC**	**CO**	**NOx**	**Non-Biogenic GHGs (CO2e)**	**Total HAP**	**Worst Single HAP**
Line 4 Quench Tank	13.52	13.52	13.52	0	0	0	0	0	0	0
Line 3 Draw Furnace	0.04	0.17	0.17	1.00E-02	0.12	1.84	2.19	2,609	0.04	0.04
Slot Furnace 2-5201	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0.01	0.01
Slot Furnace 2-5202	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0.01	0.01
Bar Furnace 2-5203A	0.05	0.21	0.21	0.02	0.15	2.34	2.79	3,324	0.05	0.05
Bar Furnace 2-5203B	0.05	0.21	0.21	0.02	0.15	2.34	2.79	3,324	0.05	0.05
Shot Peener	4.51	4.51	4.51	0	0	0	0	0	0	0
Dip Tank 3-2874A	0	0	0	0	3.0	0	0	0	0	0
Dip Tank 3-2874B	0	0	0	0	3.0	0	0	0	0	0
Total for Modification	18.19	18.70	18.70	0.06	6.48	7.42	8.85	10,537	Negl.	Negl.
Source-wide PTE Before Modification	66.71	66.99	42.39	0.18	138.07	11.78	27.68	36,156	<25	<10
Source-wide PTE After Modification	84.90	85.69	61.09	0.24	144.55	19.20	36.53	46,693	<25	<10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

*$PM_{2.5}$ listed is direct $PM_{2.5}$.

This modification to an existing minor stationary source is not major because the source-wide limited emissions of all regulated pollutants are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PM, PM_{10} and $PM_{2.5}$
The source-wide potential to emit of PM, PM_{10} and $PM_{2.5}$ are in excess of 250 tons per year, each.
Therefore, the Permittee has accepted the following source-wide emission limitations on PM, PM_{10} and $PM_{2.5}$ to remain a minor source for PSD:

PSD Minor Limits [326 IAC 2-2]

PM, PM_{10} and $PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99	2.085	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		1.89	
Vertical Opposing Disc Grinder	3-0397		2.64	

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Small Line Quench Tank	3-2821	2.97	1.05	1.05
Medium Line Quench Tank	3-2838A	2.97	2.97	2.97
Large Line Quench Tank	3-2845	2.97	1.75	1.75
Line 4 Quench Tank	3-4000	3.09	3.40	2.26

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Shot Peener	3-1804	0.99	0.06	0.06
Shot Peener	3-1821	0.99	0.06	0.06
Shot Peener	3-1823	0.99	0.06	0.06
Shot Peener	3-1824	0.99	0.99	0.99
Shot Peener	3-1825	0.99	0.99	0.99
Shot Peener	3-1826	1.03	1.03	1.03

Compliance with these emission limits along with the uncontrolled potential to emit PM, PM_{10} and $PM_{2.5}$ from insignificant activities and all other sources of emissions located at this source, will limit the potential to emit of PM, PM_{10} and $PM_{2.5}$ 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.

VOC
The source-wide potential to emit of VOC is in excess of 250 tons per year. Therefore, the Permittee has accepted the following source-wide emission limitations to remain a minor source for PSD:

PSD Minor Limit [326 IAC 2-2]

VOC emissions shall be limited to:

Emission Unit	**ID**	**VOC Limit** (ton/yr)
Dip Coating	3-2813	80.81
Dip Coating	3-2865	
Dip Coating	3-2865A	
Dip Coating	3-2867	
Dip Coating	3-2870	
Dip Coating	3-2874A	
Dip Coating	3-2874B	
Dip Coating	3-2869	55.19
Dip Coating	3-2872	
Dip Coating	3-2873	

Compliance with these emission limits, along with the potential to emit VOC from all other emission units 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.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

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

CAM:

(c) 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 Part 70 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:

CAM Applicability Analysis - PM/PM10/PM2.5							
Emission Unit	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled PTE** (ton/yr)	**Controlled PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
Line 4 Quench Tank	Yes	Yes	160.97	13.52	100	Y	N
Shoot Peener 3-1826	Yes	Yes	390.92	4.51	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the Line 4 quench tank and the shot peener for PM, PM10 and PM2.5 upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

State Rule Applicability Determination

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

326 IAC 2-2 (Prevention of Significant Deterioration)
PSD applicability is discussed under the Permit Level Determination – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the medium line draw furnace, both Line 4 slot furnaces, both Line 4 bar furnaces, the Line 4 coil spring operation with quench tank, both dip coaters and the shot peener, combined, 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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
In accordance with 326 IAC 6-3-1(c)(3), 326 IAC 6-3-2 does not apply because 326 IAC 6.8 applies to the Line 4 slot furnaces, both Line 4 bar furnaces, the Line 4 coil spring operation with quench tank and the shot peener. 326 IAC 6-3-2 does not apply to the dip coating units because they are specifically exempted by 326 IAC 6-3-1(b)(5).

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
This rule applies to sources located in Lake County that are specifically listed in 326 IAC 6.8-4, 6.8-5, 6.8-8, 6.8-9, 6.8-10 and 6.8-11 or have the potential to emit 100 tons or more or actual emissions of 10 tons or more of particulate matter per year. This source is specifically listed in 326 IAC 6.8-4. Therefore, the rule applies to the following emission units proposed in this modification: the quench tank associated with the Line 4 manufacturing line (3-4000), both Line 4 slot furnaces (2-5201 and 2-5102), both bar furnaces (2-5203A and 2-5203B), and shot peener 3-1826. This rule does not apply to the dip tanks because they are not sources of particulate matter emissions.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This rule applies to new facilities, as of January 1, 1980, that have potential VOC emissions of twenty-five tons or more per year, are located anywhere in the state, and are not otherwise regulated by another Article 8 rule, 326 IAC 20-48 or 326 IAC 20-56. The existing permit contains a VOC BACT minor limit in Condition D.3.3 for the Medium Quench Tank. At the time the limit was included in the permit, the actual potential to emit of VOC was unknown for the Medium Quench Tank. On January 19, 2012, Amsted Rail Company performed stack testing for VOC on the Medium Quench Tank. VOC testing showed the potential to emit of VOC was 4.16 tons per year when operating at a process throughput of 5 tons per hour.

Because the potential to emit of the Medium Quench Tank is less than 25 tons per year, the 326 IAC 8-1-6 minor limit is not needed. Original Condition D.3.3 and all other conditions related to the 326 IAC 8-1-6 minor limit have been removed.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
The dip tanks proposed as part of this modification are subject to 326 IAC 8-2-9 because the source is located in Lake County and coats metal parts or products under the SIC of major groups #34.

(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.

326 IAC 8-7-2 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
This source is located in Lake County and has a source-wide potential to emit VOC in excess of 25 tons per year. In accordance with 326 IAC 8-7-2(b), facilities subject to 326 IAC 8-2 are exempt from the emission limit requirements of 326 IAC 8-7-2.

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.

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

Emission Unit	Parameter	Frequency
Line 4 Quench Tank controlled by an oil smoke filter	PM, PM10, PM2.5	Continuous Operation of Control Device
Paint Booth 3-2715 (Dry Filters)	PM, PM10, PM2.5	Continuous Operation of Control Device
Paint Booth 3-2714 (Dry Filters)	PM, PM10, PM2.5	Continuous Operation of Control Device

Summary of Testing Requirements				
Emission Unit	**Control Device**	**Timeframe for Testing**	**Pollutant**	**Frequency of Testing**
Medium Line Quench Tank	Oil Smoke Filter	Within 60 days of reaching maximum capacity and no later than 180 days after initial startup	PM, PM10, PM2.5	Every 5 Years
Line 4 Quench Tank	Oil Smoke Filter	Within 60 days of reaching maximum capacity and no later than 180 days after initial startup	PM, PM10, PM2.5	Every 5 Years
Shot Preener	Oil Smoke Filter	Within 60 days of reaching maximum capacity and no later than 180 days after initial startup	PM, PM10, PM2.5	Every 5 Years

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

Emission Unit	Parameter	Frequency	Response
Small Line Oil Smoke Filter	Visible Emissions Normal or Abnormal	Daily	A Reasonable Response
Large Line / Oil Smoke Filter	Visible Emissions Normal or Abnormal	Daily	A Reasonable Response
Large Line / ESP	Visible Emissions Normal or Abnormal	Daily	A Reasonable Response
Line 4 Oil Smoke Filter	Visible Emissions Normal or Abnormal	Daily	A Reasonable Response
Shot Peener 3-1826 Baghouse	Visible Emissions Normal or Abnormal	Daily	A Reasonable Response

These monitoring conditions are necessary because, the control devices must operate properly in order to ensure compliance with Prevention of Significant Deterioration (PSD) minor limits.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T089-23826-00204. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Modification No. 1: On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlying provisions. The change is only to sites of these rules in Sections A.1, A.2, A.3, B.10, B.11, B.20, C.15, and the facility description boxes in Sections D.1, D.2, D.3, D.4, D.5, D.6, D.7 and D.8. Rule cites in original Conditions D.2.5, D.3.6, D.4.2 and D.7.5 have been updated and the language in the conditions was standardized. Revisions as a result of these changes are shown below:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(~~15~~**14**)] [326 IAC 2-7-1(22)]

****

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(~~15~~**14**)]

****

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(~~15~~**14**)]

****

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)] [326 IAC 1-6-3]

****

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

****

(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~~**8**) be revised in response to an emergency.

****

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)~~,~~ **or** (c)~~, or (e)~~ without a prior permit revision, if each of the following conditions is met:

****

(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)~~,~~ **or** (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)~~,~~ **and** (c)(1)~~, and (e)(2)~~.

C.15 Risk Management Plan [326 IAC 2-7-5(~~12~~**11**)] [40 CFR 68]

****

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~14)]:
****

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~14)]: Coil Spring Grinders, which include the following:
****

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

D.2.~~5~~**4** Preventive Maintenance Plan [326 IAC 2-7-5(**12**~~13~~)]

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 **IAC 2-7-5(~~15~~14)]:** Coil Spring Manufacturing Process Lines, which include the following:
****

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

D.3.~~6~~**4** Preventive Maintenance Plan [326 IAC 2-7-5(**12**~~13~~)]

****

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~14)]:
****

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

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(**12**~~13~~)]

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

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~14)]:
****

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

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~14)]:
****

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

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(~~15~~14)]:
****

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

D.7.~~4~~5 Preventive Maintenance Plan [326 IAC 2-7-5(**12**~~13~~)]

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

SECTION D.8 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(1~~5~~4)]:

****

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

Modification No. 2: IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

C.19 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~~**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. Support information includes the following:**

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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.
****

Modification No. 3: IDEM, OAQ has decided to clarity the Permittee's responsibility under CAM.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**[40 CFR 64][326 IAC 3-8]**

(a) 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:

****

(b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.16 Response to Excursions or Exceedances **[40 CFR 64][326 IAC 3-8]**[326 IAC 2-7-5] [326 IAC 2-7-6]

(l) Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation**, not subject to CAM,** in this permit:

****

(II)

(a) CAM Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. 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). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) CAM recordkeeping requirements.

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**[40 CFR 64] [326 IAC 3-8]**

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of this paragraph.** 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.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(b) **********

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:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C – General Reporting.** 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”.

Modification No. 4: IDEM, OAQ is clarifying that the source, Amsted Rail Company, Inc., is the party responsible for the Continuous Compliance Plan. IDEM is revising rule cites and is clarifying the requirements related to the CCP.

C.12 ~~Lake County:~~ Continuous Compliance Plan [326 IAC 6.8-8-**1**]**[326 IAC 6.8-8-8]**

~~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.~~

(a) Pursuant to 326 IAC 326 IAC 6.8-8-1, the source (Amsted Rail Company, Inc.) shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The source (Amsted Rail Company, Inc.) shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.

(b) Pursuant to 326 IAC 6.8-8-8, the source (Amsted Rail Company, Inc.) shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The source (Amsted Rail Company, Inc.) shall submit the updated CCP, if required to IDEM, OAQ within thirty (30) days of the update.

(c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

Modification No. 5: IDEM, OAQ is removing references to the local agency contained in Condition B.4. Revisions are shown below:

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.~~

Modification No. 6: IDEM, OAQ is updating Condition C.5 – Fugitive Dust Emissions to more closely match the rule.

C.5 Fugitive ~~Dust~~**Particulate Matter** Emissions [326 IAC 6.8-10-3]

~~**********~~

Modification No. 7: IDEM, OAQ is updating Condition C.18. This source has a potential to emit after issuance of CO, NOx and SO2 of less than 2,500 TPY and a potential to emit after issuance of PM10 and VOC of less than 250 TPY. This source is subject to triennial reporting. Revisions are shown below:

C.18 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).~~

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:

(1) starting in 2013 and every three (3) years thereafter, and

(2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

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

(2) 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 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).

Modification No. 8: IDEM, OAQ is clarifying the contents of the annual compliance certification report.

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

~~**********~~

~~(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.~~

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

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

****

Modification No. 9: IDEM, OAQ is fixing a typographical error in Condition C.14.

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

(b) **********

Modification No. 10: IDEM, OAQ, Compliance Data Section has been reorganized and is now call Compliance and Enforcement Branch. Condition C.20 has been revised to make this change.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

****

(b) The address for report submittal is:

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

****

Modification No. 11: IDEM, OAQ is updating Section A.1

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [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~~**(618) 225-6419**
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 NA-New Source Review for $PM_{2.5}$~~ Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

Modification No. 12: IDEM, OAQ is revising Section A.2 and Section A.3 to add the emission units proposed by this significant source modification. Also, IDEM has revised the location of some emission units within the A Section and corrected the control device descriptions. Revisions are shown below:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

****

(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 ~~a baghouse~~**an oil smoke filter**, 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~~**an oil smoke 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 2-5097~~A~~, permitted in 2011, with a maximum design capacity of ~~5.0~~**5.1**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 **or an oil smoke filter**, 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.

(4) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes an oil quench tank, identified as 3-4000, approved for construction in 2012, using an oil smoke filter, identified as 3-4001, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. This process also includes a natural gas-fired draw furnace, identified as 2-5097A, approved for construction 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.

(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
3-2874A	**Water-based Clear Coating**
3-2874B	**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(14)]

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~~
~~2-5097A~~	~~Medium Line Draw Furnace~~	~~5.1~~
~~2-5164~~	~~Large Line Draw Furnace~~	~~9.8~~
2-5201	**Line 4 Slot Furnace**	**1.25**
2-5202	**Line 4 Slot Furnace**	**1.25**
2-5203A	**Line 4 Bar Furnace**	**6.5**
2-5203B	**Line 4 Bar Furnace**	**6.5**

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

(6) One (1) Shot Peener, identified as 3-1826, approved for construction in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826A, for particulate matter control, and exhausting to Stack 26.

****

Modification No. 13: The furnaces in Section A.4(f) were never constructed and were removed from the permit. Revisions are shown below:

A.4 Other Insignificant Activities [326 IAC 2-7-1(21)]

This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

****

~~(f) Three (3) electric induction furnaces, permitted in 2011, each with a maximum capacity of 5.0 tons of metal per hour.~~

Modification No. 14: The facility description box in Section D.3 was revised to add Line 4, to reinstate draw furnace 2-5097, and to add another control option for the quench tank on the Large Line Coil Spring Manufacturing Process. The control device descriptions were corrected.

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 ~~a baghouse~~**an oil smoke filter**, 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~~**an oil smoke 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 2-5097~~A~~, permitted in 2011, with a maximum design capacity of ~~5.0~~**5.1** 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 **or an oil smoke filter**, 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.

(4) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes an oil quench tank, identified as 3-4000, approved for construction in 2012, using an oil smoke filter, identified as 3-4001, to control particulate emissions (oil mists) generated during the quenching operation, and exhausting to Stack 14. This process also includes a natural gas-fired draw furnace, identified as 2-5097A, approved for construction 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.

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

Modification No. 15: IDEM, OAQ is revising original Condition D.3.1 to include the requirements for furnaces 2-5163 and 2-5164. These furnaces were moved from Section D.6 to Section D.3. Conditions D.3.4 and D.3.5 have been

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

(a) 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

(b) Pursuant to 326 IAC 6.8-2-4(b), (Lake County: PM10 and total suspended particulates (TSP) emissions), the small line draw furnace (2-5163) and the large line draw furnace (3-5164) shall fire natural gas only.

Modification No. 16: IDEM, OAQ is revising Condition D.3.2 to add an emission limitation for the draw furnace 2-5097 and the quench tank, identified as 3-4000.

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**, identified as** ~~(~~3-2838A~~)~~**, natural gas draw furnace, identified as 2-5097, the oil quench tank, identified as 3-4000 and the medium line draw furnace, identified as 2-5097A,** shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Modification No. 17: IDEM, OAQ has removed original Condition D.3.3 because a limit is not needed to ensure the requirements of 326 IAC 8-1-6 do not apply to the Medium Quench Tank. In addition, original Conditions D.3.8(c), D.3.9, D.3.13(a) and D.3.14 are no longer needed because the 326 IAC 8-1-6 minor limit is no longer applicable. Original Condition D.3.12 was removed because none of the units use a baghouse. The section was renumbered due to the deletion of the original conditions. Additional revisions to the record keeping condition are shown in Modification No. 22, below.

~~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.~~8~~**6** Testing Requirements [326 IAC 2-1.1-11] [40 CFR 64]

~~**********~~

~~(c) In order to demonstrate compliance with Condition D.3.3, the Permittee shall perform testing of VOC emissions from the inlet and outlet of the baghouse controlling the medium line quench tank (3-2838A) no later than one hundred eighty (180) days of issuance of SSM No. 089-30392-00204.~~

~~**********~~

~~D.3.9 Volatile Organic Compounds (VOC)~~

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

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

~~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~~

~~D.3.12 Broken or Failed Bag Detection – Multi-Compartment Baghouse~~

~~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.~~13~~**8** Record Keeping Requirements [40 CFR 64]

~~(a) To document the compliance status 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).~~

~~**********~~

~~D.3.14 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 reporting required by this condition.~~

Reporting Form:

~~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~~
~~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.~~

Modification No. 18: IDEM, OAQ has revised the PSD minor limit contained in Condition D.3.4 to include a limit on the Line 4 Quench Tank. This limit, along with other PM, PM10 and PM2.5 limits in the permit ensure emissions of PM, PM10 and PM2.5 are less than 250 TPY and render the requirements of 326 IAC 2-2 not applicable to the entire source. IDEM combined original Conditions D.3.4 and D.3.5 to provide one set of PSD minor limits. Remaining conditions have been renumbered to account for the condition removed from the permit.

D.3.~~4~~**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)~~
~~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.~~

PM, PM_{10} and $PM_{2.5}$ emissions shall be limited as follows:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Small Line Quench Tank	**3-2821**	**2.97**	**1.05**	**1.05**
Medium Line Quench Tank	**3-2838A**	**2.97**	**2.97**	**2.97**
Large Line Quench Tank	**3-2845**	**2.97**	**1.75**	**1.75**
Line 4 Quench Tank	**3-4000**	**3.09**	**3.40**	**2.26**

Compliance with these limits combined with the limits in Conditions D.2.3, D.5.2, and D.7.3, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

Modification No. 19: IDEM, OAQ is changing the compliance determination requirements in original Conditions D.3.7 and D.3.8 to include requirements for the Line 4 Quench Tank. IDEM is also fixing some typographical errors and standardizing the testing language.

D.3.~~7~~**5** Particulate Matter [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5] [40 CFR 64]

(a) In order to ~~comply~~**ensure compliance** with Conditions D.3.1~~,~~ **and** D.3.**3**~~4, and D.3.5~~, the electrostatic precipitators **or oil smoke filter** for PM, PM_{10}, and $PM_{2.5}$, control shall be in operation and control**ling** emissions at all times when the ~~associated~~ Large Line Coil Spring Manufacturing Process is in operation.

(b) In order to ~~comply~~**ensure compliance** with Conditions **D.3.1,** D.3.2~~, D.3.4,~~ and D.3.~~5~~**3**, the ~~baghouse~~**oil smoke filter** for PM, PM_{10}, $PM_{2.5}$~~, and VOC~~ control shall be in operation and control**ling** emissions at all times when the ~~associated~~Small Line Coil Spring Manufacturing Process or Medium Line Coil Spring Manufacturing Process is in operation.

(c) In order to ensure compliance with Conditions D.3.2 and D.3.3, the oil smoke filter for PM, PM10 and PM2.5 control shall be in operation and controlling emissions at all times the Line 4 Coil Spring Manufacturing Process is in operation.

D.3.~~8~~**6** Testing Requirements [326 IAC 2-1.1-11] [40 CFR 64]

(a) In order to demonstrate **the** compliance **status** with Conditions D.3.~~2~~**1**, D.3.~~4~~**2**, and D.3.~~5~~**3**, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$, testing of the ~~baghouse~~**oil smoke filter** controlling the oil quench tank (3-2838A) associated with the Medium Line Coil Spring Manufacturing Process no later than one hundred eighty (180) days after the start of operation of the Medium Line Coil Spring Manufacturing Process**, utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.** PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate **the** compliance **status** with Conditions D.3.1, D.3.~~4~~**2** and D.3.~~5~~**3**, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$, testing of the ~~baghouse~~**oil smoke filter** 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 no later than three hundred sixty-five (365) days of issuance of SPM No. 089-30862-00204**, utilizing methods approved by the Commissioner at least once every five (5) years from the**

date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. 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 VOC emissions from the inlet and outlet of the baghouse controlling the medium line quench tank (3-2838A) no later than one hundred eighty (180) days of issuance of SSM No. 089-30392-00204.~~**In order to demonstrate the compliance status with Conditions D.3.2 and D.3.3 and within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM10 and PM2.5 testing on the oil smoke filter controlling emissions from the Line 4 quench tank, utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

~~PM, PM_{10}, $PM_{2.5}$, and VOC testing shall be conducted utilizing methods as approved by the Commissioner. These PM, PM_{10}, $PM_{2.5}$, tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.~~

Modification No. 20: IDEM, OAQ has revised original Condition D.3.10 to include VE notations for the Line 4 Quench Tank. IDEM also clarified which units are subject to CAM. Part 70 Operating Permit Renewal T098-23826-00204 indicates the Large Line Coil Spring Manufacturing Line is the only exiting coil spring line subject to CAM. The requirements for the large line have been simplified.

D.3.1~~0~~**7** 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. **[40 CFR 64]**

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

(4) Visible emission notations of the stack exhaust for the Line 4 quench tank shall be performed at least once per day during normal daylight operations. [40 CFR 64]

****

Modification No. 21: IDEM, OAQ is removing Condition D.3.11 – Parametric Monitoring. IDEM has determined that visible emission notations in accordance with Reference Method 22 are adequate to ensure compliance with the particulate matter emission limitations. The units are not considered large units, vent inside and a failure would be immediately obvious. Revisions are shown below:

~~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 and Exceedances contains the Permittee's obligations with regard 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 or replaced at least once every six (6) months.~~

Modification No. 22: IDEM, OAQ revised original Condition D.3.13 to include record keeping requirements for the Line 4 quench tank oil smoke filter. The condition has been revised to require daily VE notations for all four processing lines. Original Condition D.3.13(a) was removed in Modification No. 17.

D.3.1~~3~~**9** Record Keeping Requirements [40 CFR 64]

~~**********~~

~~(b) To document the compliance status with Condition 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 and Small Line Coil Spring Manufacturing Process 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).~~

~~(c) To document the compliance status 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).~~

(a) In order to document the compliance status with Condition D.3.7(a)(3), the Permittee shall maintain daily records of visible emission notations of the small line quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.)

(b) In order to document the compliance status with Condition D.3.7(a)(2), the Permittee shall maintain daily records of visible emission notations of the medium line quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.)

(c) In order to document the compliance status with Condition D.3.7(a)(1), the Permittee shall maintain daily records of visible emission notations of the large line quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.) [40 CFR 64]

(d) In order to document the compliance status with Condition D.3.7(a)(4), the Permittee shall maintain daily records of visible emission notations of the line 4 quench tank exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for a lack of visible emission notation (e.g. the process did not operate that day.) [40 CFR 64]

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

Modification No. 23: IDEM, OAQ has revised the facility description box in Section D.5 to add the dip tanks proposed in this modification.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:
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
3-2874A	**Water-based Clear Coating**
3-2874B	**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.)

Modification No. 24: IDEM, OAQ is revising Condition D.5.2 to include the proposed dip tanks to the PSD minor limit for VOC. Also, the VOC limit for the water based clear coating operations has been increased to accommodate the addition of the new dip tanks.

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.~~

Emission Unit	ID	VOC Limit (ton/yr)
Dip Coating	**3-2813**	**80.81**
Dip Coating	**3-2865**	
Dip Coating	**3-2865A**	
Dip Coating	**3-2867**	
Dip Coating	**3-2870**	
Dip Coating	**3-2874A**	
Dip Coating	**3-2874B**	
Dip Coating	**3-2869**	**55.19**
Dip Coating	**3-2872**	
Dip Coating	**3-2873**	

Compliance with these limits combined with the limits in Conditions D.2.3, D.3.3 and D.7.3, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

Modification No. 25: IDEM, OAQ is revising the facility description box in Section D.6 to remove emission units 2-5163, 2-5097 and 2-5164. These emission units have been included with their coil spring line. Also, the slot furnaces and bar furnaces proposed in this modification have been added.

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:
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~~	~~5.0~~
~~2-5164~~	~~Large Line Draw Furnace~~	~~9.8~~
2-5201	**Line 4 Slot Furnace**	**1.25**
2-5202	**Line 4 Slot Furnace**	**1.25**
2-5203A	**Line 4 Bar Furnace**	**6.5**
2-5203B	**Line 4 Bar Furnace**	**6.5**

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

Modification No. 26: IDEM, OAQ, has revised Condition D.6.2 to include emission limitations for the two slot furnaces and two bar furnaces proposed under this source modification. Draw furnace 2-5097A has been moved to Section D.3.

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),~~ **Line 4 Slot Furnace (2-5201), Line 4 Slot Furnace (2-5202), Line 4 Bar Furnace (2-5203A) and Line 4 Bar Furnace (2-5203B),** shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Modification No. 27: IDEM, OAQ is revising the facility description box in Section D.7 to add the shot peener proposed under this source modification.

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:
(b) **********

(6) One (1) Shot Peener, identified as 3-1826, approved for construction in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826A, for particulate matter control, and exhausting to Stack 26.

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

Modification No. 28: IDEM, OAQ has combined Condition D.7.3 and D.7.4 and included emission limits for the proposed shot peener. Remaining conditions have been renumbered to account for the condition removed.

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.~~

PM, PM_{10} and $PM_{2.5}$ shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Shot Peener	**3-1804**	**0.99**	**0.06**	**0.06**
Shot Peener	**3-1821**	**0.99**	**0.06**	**0.06**
Shot Peener	**3-1823**	**0.99**	**0.06**	**0.06**
Shot Peener	**3-1824**	**0.99**	**0.99**	**0.99**
Shot Peener	**3-1825**	**0.99**	**0.99**	**0.99**
Shot Peener	**3-1826**	**1.03**	**1.03**	**1.03**

Compliance with these limits combined with the limits in Conditions D.2.3, D.3.3 and D.5.2, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

Modification No. 29: IDEM, OAQ is adding compliance determination requirements, stack testing, for the new shot peener. IDEM is also standardizing the format of the testing conditions.

D.7.~~7~~**6** Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate **the** compliance **status** with Conditions D.7.2~~,~~ **and** 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) or Shot Peener (3-1825) no later than one hundred eighty (180) days after the start of operation of each Shot Peener~~.~~**, utilizing methods approved by the Commissioner. Repeat testing on shot peeners 3-1824, 3-1825, 3-1804, 3-1821, 3-1823 and 3-1826 shall be conducted on at least two (2) of the shot peeners every five (5) years. Testing shall be conducted in a manner to ensure the time period between tests on each unit does not exceed fifteen (15) years. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.** PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate **the** compliance **status** with Conditions D.7.1~~,~~ **and** 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 (3-1804), Shot Peener (3-1821), or Shot Peener (3-1823) no later than three hundred sixty-five (365) days of issuance of SPM No. 089-30862-00204**, utilizing methods approved by the Commissioner. Repeat testing on shot peeners 3-1824, 3-1825, 3-1804, 3-1821, 3-1823 and 3-1826 shall be conducted on at least two (2) of the shot peeners every five (5) years. Testing shall be conducted in a manner to ensure the time period between tests on each unit does not exceed fifteen (15) years. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.** PM_{10} and $PM_{2.5}$ includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Condition D.7.2 and Condition D.7.3, and within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM10 and PM2.5 testing on the shot peener 3-1826, exhausting to Stack 26, utilizing methods approved by the Commissioner. Repeat testing on shot peeners 3-1824, 3-1825, 3-1804, 3-1821, 3-1823 and 3-1826 shall be conducted on at least two (2) of the shot peeners every five (5) years. Testing shall be conducted in a manner to ensure the time period between tests on each unit does not exceed fifteen (15) years. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 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. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.~~

Modification No. 30: IDEM, OAQ is adding compliance monitoring requirements. VE notations are now required for all of the control devices in this section.

D.7.~~8~~**7** 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.~~ **Visible emission notations of the stack exhausts for Shot Peeners 3-1804, 3-1821, 3-1823, 3-1824, 3-1825 and 3-1826 shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.**

~~**********~~

Modification No. 31: IDEM, OAQ is removing original Condition D.7.9. IDEM has determined that one parametric monitoring parameter is adequate because the control devices vent indoors, the peeners are not large units and a failure would be immediately obvious. Therefore, conditions related to the measurement of a pressure drop are no longer needed. The remaining Conditions were renumbered.

~~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 and Exceedances contains the Permittee's obligations with regard 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 or replaced at least once every six (6) months.~~

Modification No. 32: IDEM, OAQ is adding record keeping requirements for shot peener, 3-1826. IDEM is also removing record keeping requirements related to pressure drop measurements because they are no longer needed.

D.7.~~11~~**9** Record Keeping Requirements

(a) To document the compliance status with Condition D.7.~~8~~**7**, the Permittee shall maintain daily records of visible emission notations of the ~~Shot Peener (3-1824) and Shot Peener (3-1825~~) baghouse stack exhausts **of Shot Peeners 3-1804, 3-1821, 3-1824, 3-1825 and 3-1826**. 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 the compliance status 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.

Modification No. 33: IDEM, OAQ is clarifying all conditions related to taking pressure drop readings across a baghouse. This change affects Conditions D.2.10.

D.2.~~10~~**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.~~**When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.** 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 the reasonable response steps required by this condition.

****

Modification No. 34: IDEM, OAQ is revising Condition D.4.5 and Condition D.4.6. IDEM is correcting the monitoring requirements related to 326 IAC 6-3-2 from these conditions.

D.4.5 Particulate Emission Limitations [326 IAC 6-3-2]

~~(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. If a condition exists which should result in a response step, the Permittee shall take a reasonable response.~~ **In accordance with 326 IAC 6-3-2(d)(1), the Permittee shall operate the dry filters in accordance with manufacturer's recommendations.**

~~(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. If a condition exists which should result in a response step, the Permittee shall take a reasonable response.~~

~~(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 the reasonable response steps required by this condition.~~

D.4.6 Record Keeping Requirements

****

(b) ~~To document the compliance status 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.

Modification No. 35: IDEM, OAQ is revising Condition D.6.1. The small line draw furnace and large line draw furnace have been moved to Section D.3.

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)~~,~~ **and** Large Line Slot Furnace (2-5036)~~, Small Line Draw Furnace (2-5163), and Large Line Draw Furnace (2-5164)~~ shall fire natural gas only.

Modification No. 36: IDEM is revising Conditions D.2.3 and D.2.4 to combine the conditions and to state these emission limits will make the source a minor source for PSD. Conditions following original Condition D.2.4 have been renumbered to reflect the removal of original Condition D.2.4. IDEM is correcting the condition references in D.2.11.

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.~~

PM, PM_{10} and $PM_{2.5}$ emissions shall be limited to:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
#1 Mattison (Large) Grinder	**3-0244**	**0.99**	**2.085**	**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**		**1.89**	
Vertical Opposing Disc Grinder	**3-0397**		**2.64**	

Compliance with these limits combined with the limits in Conditions D.3.3, D.5.2, and D.7.3, and the unrestricted potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ from all other equipment at this source will limit the potential to emit of VOC, PM, PM_{10} and $PM_{2.5}$ 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.

D.2.11 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.~~9~~**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 the compliance status with Condition D.2.~~10~~**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 the compliance status with Condition D.2.~~10~~**9**(b), the Permittee shall maintain records of calibrations of the instrument used for determining the pressure drop across the baghouse.

****

Modification No. 37: IDEM, OAQ is correcting the condition references in original Condition D.7.6.

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

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

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-31440-00204 and Significant Permit Modification No. 089-31498-00204. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to David Matousek at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8253 or toll free at 1-800-451-6027 extension 2-8253.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

Appendix A to the Technical Support Document (TSD)
Potential to Emit Summary

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Uncontrolled Emissions of the Modification (TPY)											
Process / Emission Unit	**PM**	**PM10**	**PM2.5**	**SO2**	**VOC**	**CO**	**NOx**	**Non-Biogenic GHGs (as CO2e)**	**Biogenic GHGs (as CO2e)**	**Total HAP**	**Hexane Worst Single HAP**
Line 4 w/ Quench Tank (3-4000)	160.97	160.97	160.97	0	0	0	0	0	0	0	0
Line 3 Draw Furnace (2-5097)	0.04	0.17	0.17	0.01	0.12	1.84	2.19	2,609	0	0.04	0.04
Slot Furnace (2-5201)	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0	0.01	0.01
Slot Furnace (2-5202)	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0	0.01	0.01
Bar Furnace (2-5203A)	0.05	0.21	0.21	2.00E-02	0.15	2.34	2.79	3,324	0	0.05	0.05
Bar Furnace (2-5203B)	0.05	0.21	0.21	2.00E-02	0.15	2.34	2.79	3,324	0	0.05	0.05
Shot Peener (3-1826)	390.92	39.09	39.09	0	0	0	0	0	0	0	0
Dip Tank (3-2874A)	0	0	0	0	3.0	0	0	0	0	0	0
Dip Tank (3-2874B)	0	0	0	0	3.0	0	0	0	0	0	0
Total for Modification	552.05	200.73	200.73	0.06	6.48	7.42	8.85	10,537	0	0.16	0.16

Controlled Emissions of the Modification (TPY)											
Process / Emission Unit	**PM**	**PM10**	**PM2.5**	**SO2**	**VOC**	**CO**	**NOx**	**Non-Biogenic GHGs (as CO2e)**	**Biogenic GHGs (as CO2e)**	**Total HAP**	**Worst Single HAP**
Line 4 w/ Quench Tank (3-4000)	0.16	0.16	0.16	0	0	0	0	0	0	0	0
Line 3 Draw Furnace (2-5097)	0.04	0.17	0.17	0.01	0.12	1.84	2.19	2,609	0	0.04	0.04
Slot Furnace (2-5201)	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0	0.01	0.01
Slot Furnace (2-5202)	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0	0.01	0.01
Bar Furnace (2-5203A)	0.05	0.21	0.21	2.00E-02	0.15	2.34	2.79	3,324	0	0.05	0.05
Bar Furnace (2-5203B)	0.05	0.21	0.21	2.00E-02	0.15	2.34	2.79	3,324	0	0.05	0.05
Shot Peener (3-1826)	0.39	0.04	0.04	0	0	0	0	0	0	0	0
Dip Tank (3-2874A)	0	0	0	0	3.0	0	0	0	0	0	0
Dip Tank (3-2874B)	0	0	0	0	3.0	0	0	0	0	0	0
Total for Modification	0.71	0.87	0.87	0.06	6.48	7.42	8.85	10,537	0	negl.	negl.

Limited Emissions of the Modification (TPY)											
Process / Emission Unit	**PM**	**PM10**	**PM2.5**	**SO2**	**VOC**	**CO**	**NOx**	**Non-Biogenic GHGs (as CO2e)**	**Biogenic GHGs (as CO2e)**	**Total HAP**	**Worst Single HAP**
Line 4 w/ Quench Tank (3-4000)	13.52	13.52	13.52	0	0	0	0	0	0	0	0
Line 3 Draw Furnace (2-5097)	0.04	0.17	0.17	1.00E-02	0.12	1.84	2.19	2,609	0	0.04	0.04
Slot Furnace (2-5201)	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0	0.01	0.01
Slot Furnace (2-5202)	0.01	0.04	0.04	3.22E-03	0.03	0.45	0.54	640	0	0.01	0.01
Bar Furnace (2-5203A)	0.05	0.21	0.21	2.00E-02	0.15	2.34	2.79	3,324	0	0.05	0.05
Bar Furnace (2-5203B)	0.05	0.21	0.21	2.00E-02	0.15	2.34	2.79	3,324	0	0.05	0.05
Shot Peener (3-1826)	4.51	4.51	4.51	0	0	0	0	0	0	0	0
Dip Tank (3-2874A)	0	0	0	0	3.0	0	0	0	0	0	0
Dip Tank (3-2874B)	0	0	0	0	3.0	0	0	0	0	0	0
Total for Modification	18.19	18.70	18.70	0.06	6.48	7.42	8.85	10,537	0	Negl.	Negl.
Sourcewide PTE Before Modification	66.71	66.99	42.39	0.18	138.07	11.78	27.68	36,156	0	< 25	< 10
Sourcewide PTE After Modification	84.90	85.69	61.09	0.24	144.55	19.2	36.53	46,693	0	< 25	< 10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA	NA

Appendix A to the Technical Support Document (TSD)
Potential to Emit - Draw Furnace (2-5097) - Natural Gas Combustion

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Heat Input Rate and Natural Gas Usage

Maximum Heat Input Rate	5.1	MMBtu/hr	and	43.8	MMCF/yr

Pollutant	Emission Factor		PTE (TPY)	Comments
PM	1.9	lb/MMCF	0.04	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM10	7.6	lb/MMCF	0.17	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM2.5	7.6	lb/MMCF	0.17	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
SO2	0.6	lb/MMCF	0.01	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
VOC	5.5	lb/MMCF	0.12	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
CO	84	lb/MMCF	1.84	AP-42, Chapter 1.4, Table 1.4-1, 7/1998
NOx	100	lb/MMCF	2.19	AP-42, Chapter 1.4, Table 1.4-1, 7/1998

Greenhouse Gas Emissions (TPY as CO2e)

Pollutant	Emission Factor		PTE (TPY)	GWP	PTE as CO2e (TPY)	Comments
CO2	53.02	kg/MMBtu	2,606	1	2,606	40 CFR 98, Subpart C, Table C-1
CH4	1.00E-03	kg/MMBtu	0.0500	21	1.05	40 CFR 98, Subpart C, Table C-2
N2O	1.00E-04	kg/MMBtu	0.0049	310	1.52	40 CFR 98, Subpart C, Table C-2
		Total	2,606	Total	2,609	

HAP Emissions (TPY)

Pollutant	Emission Factor		PTE (TPY)	Comments
Benzene	2.10E-03	lb/MMCF	4.60E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Dichlorobenzene	1.20E-03	lb/MMCF	2.63E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Formaldehyde	7.50E-02	lb/MMCF	0.0016	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Hexane	1.8	lb/MMCF	**0.04**	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Toluene	3.40E-03	lb/MMCF	7.45E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Lead	5.00E-04	lb/MMCF	1.10E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Cadmium	1.10E-03	lb/MMCF	2.41E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Chromium	1.40E-03	lb/MMCF	3.07E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Manganese	3.80E-04	lb/MMCF	8.32E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Nickel	2.10E-03	lb/MMCF	4.60E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
	Total HAP (TPY)		0.04	

Methodology:

1) PTE (TPY) = Emission Factor (lb/MMCF) x Usage (MMCF/yr) x 1 ton / 2,000 lb
2) PTE (TPY) = Emission Factor (Kg/MMBtu) x 2.2 lb/Kg x Input Rate (MMBtu/hr) x 4.38 Ton-Hr/lb-yr
3) PTE (TPY as CO2e) = Emission Rate CO2 (TPY) + Emission Rate CH4 (TPY) x GWP CH4 + Emission Rate N2O (TPY) x GWP CH4
4) Gas Usage (MMCF/yr) = Heat Input (MMBtu/hr) x 1 MMCF/ 1,020 MMBtu x 8,760 hr/yr

Appendix A to the Technical Support Document (TSD)
Potential to Emit - Slot Furnace (2-5201) - Natural Gas Combustion

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Heat Input Rate and Natural Gas Usage

Maximum Heat Input Rate	1.25	MMBtu/hr	and	10.74	MMCF/yr

Pollutant	Emission Factor		PTE (TPY)	Comments
PM	1.9	lb/MMCF	0.01	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM10	7.6	lb/MMCF	0.04	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM2.5	7.6	lb/MMCF	0.04	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
SO2	0.6	lb/MMCF	3.22E-03	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
VOC	5.5	lb/MMCF	0.03	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
CO	84	lb/MMCF	0.45	AP-42, Chapter 1.4, Table 1.4-1, 7/1998
NOx	100	lb/MMCF	0.54	AP-42, Chapter 1.4, Table 1.4-1, 7/1998

Greenhouse Gas Emissions (TPY as CO2e)

Pollutant	Emission Factor		PTE (TPY)	GWP	PTE as CO2e (TPY)	Comments
CO2	53.02	kg/MMBtu	639	1	639	40 CFR 98, Subpart C, Table C-1
CH4	1.00E-03	kg/MMBtu	0.0100	21	0.21	40 CFR 98, Subpart C, Table C-2
N2O	1.00E-04	kg/MMBtu	0.0012	310	0.37	40 CFR 98, Subpart C, Table C-2
		Total	639	Total	640	

HAP Emissions (TPY)

Pollutant	Emission Factor		PTE (TPY)	Comments
Benzene	2.10E-03	lb/MMCF	1.13E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Dichlorobenzene	1.20E-03	lb/MMCF	6.44E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Formaldehyde	7.50E-02	lb/MMCF	0.0004	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Hexane	1.8	lb/MMCF	**0.01**	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Toluene	3.40E-03	lb/MMCF	1.83E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Lead	5.00E-04	lb/MMCF	2.69E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Cadmium	1.10E-03	lb/MMCF	5.91E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Chromium	1.40E-03	lb/MMCF	7.52E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Manganese	3.80E-04	lb/MMCF	2.04E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Nickel	2.10E-03	lb/MMCF	1.13E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
	Total HAP (TPY)		0.01	

Methodology:

1) PTE (TPY) = Emission Factor (lb/MMCF) x Usage (MMCF/yr) x 1 ton / 2,000 lb
2) PTE (TPY) = Emission Factor (Kg/MMBtu) x 2.2 lb/Kg x Input Rate (MMBtu/hr) x 4.38 Ton-Hr/lb-yr
3) PTE (TPY as CO2e) = Emission Rate CO2 (TPY) + Emission Rate CH4 (TPY) x GWP CH4 + Emission Rate N2O (TPY) x GWP CH4
4) Gas Usage (MMCF/yr) = Heat Input (MMBtu/hr) x 1 MMCF/ 1,020 MMBtu x 8,760 hr/yr

Appendix A to the Technical Support Document (TSD)
Potential to Emit - Slot Furnace (2-5202) - Natural Gas Combustion

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Heat Input Rate and Natural Gas Usage

Maximum Heat Input Rate	1.25	MMBtu/hr	and	10.74	MMCF/yr

Pollutant	Emission Factor		PTE (TPY)	Comments
PM	1.9	lb/MMCF	0.01	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM10	7.6	lb/MMCF	0.04	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM2.5	7.6	lb/MMCF	0.04	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
SO2	0.6	lb/MMCF	3.22E-03	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
VOC	5.5	lb/MMCF	0.03	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
CO	84	lb/MMCF	0.45	AP-42, Chapter 1.4, Table 1.4-1, 7/1998
NOx	100	lb/MMCF	0.54	AP-42, Chapter 1.4, Table 1.4-1, 7/1998

Greenhouse Gas Emissions (TPY as CO2e)

Pollutant	Emission Factor		PTE (TPY)	GWP	PTE as CO2e (TPY)	Comments
CO2	53.02	kg/MMBtu	639	1	639	40 CFR 98, Subpart C, Table C-1
CH4	1.00E-03	kg/MMBtu	0.0100	21	0.21	40 CFR 98, Subpart C, Table C-2
N2O	1.00E-04	kg/MMBtu	0.0012	310	0.37	40 CFR 98, Subpart C, Table C-2
		Total	639	Total	640	

HAP Emissions (TPY)

Pollutant	Emission Factor		PTE (TPY)	Comments
Benzene	2.10E-03	lb/MMCF	1.13E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Dichlorobenzene	1.20E-03	lb/MMCF	6.44E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Formaldehyde	7.50E-02	lb/MMCF	0.0004	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Hexane	1.8	lb/MMCF	**0.01**	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Toluene	3.40E-03	lb/MMCF	1.83E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Lead	5.00E-04	lb/MMCF	2.69E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Cadmium	1.10E-03	lb/MMCF	5.91E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Chromium	1.40E-03	lb/MMCF	7.52E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Manganese	3.80E-04	lb/MMCF	2.04E-06	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Nickel	2.10E-03	lb/MMCF	1.13E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
	Total HAP (TPY)		0.01	

Methodology:

1) PTE (TPY) = Emission Factor (lb/MMCF) x Usage (MMCF/yr) x 1 ton / 2,000 lb
2) PTE (TPY) = Emission Factor (Kg/MMBtu) x 2.2 lb/Kg x Input Rate (MMBtu/hr) x 4.38 Ton-Hr/lb-yr
3) PTE (TPY as CO2e) = Emission Rate CO2 (TPY) + Emission Rate CH4 (TPY) x GWP CH4 + Emission Rate N2O (TPY) x GWP CH4
4) Gas Usage (MMCF/yr) = Heat Input (MMBtu/hr) x 1 MMCF/ 1,020 MMBtu x 8,760 hr/yr

Appendix A to the Technical Support Document (TSD)
Potential to Emit - Bar Furnace (2-5203A) - Natural Gas Combustion

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Heat Input Rate and Natural Gas Usage

Maximum Heat Input Rate	6.5	MMBtu/hr	and	55.82	MMCF/yr

Pollutant	Emission Factor		PTE (TPY)	Comments
PM	1.9	lb/MMCF	0.05	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM10	7.6	lb/MMCF	0.21	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM2.5	7.6	lb/MMCF	0.21	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
SO2	0.6	lb/MMCF	0.02	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
VOC	5.5	lb/MMCF	0.15	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
CO	84	lb/MMCF	2.34	AP-42, Chapter 1.4, Table 1.4-1, 7/1998
NOx	100	lb/MMCF	2.79	AP-42, Chapter 1.4, Table 1.4-1, 7/1998

Greenhouse Gas Emissions (TPY as CO2e)

Pollutant	Emission Factor		PTE (TPY)	GWP	PTE as CO2e (TPY)	Comments
CO2	53.02	kg/MMBtu	3,321	1	3,321	40 CFR 98, Subpart C, Table C-1
CH4	1.00E-03	kg/MMBtu	0.0600	21	1.26	40 CFR 98, Subpart C, Table C-2
N2O	1.00E-04	kg/MMBtu	0.0063	310	1.95	40 CFR 98, Subpart C, Table C-2
		Total	3,321	Total	3,324	

HAP Emissions (TPY)

Pollutant	Emission Factor		PTE (TPY)	Comments
Benzene	2.10E-03	lb/MMCF	5.86E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Dichlorobenzene	1.20E-03	lb/MMCF	3.35E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Formaldehyde	7.50E-02	lb/MMCF	0.0021	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Hexane	1.8	lb/MMCF	**0.05**	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Toluene	3.40E-03	lb/MMCF	9.49E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Lead	5.00E-04	lb/MMCF	1.40E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Cadmium	1.10E-03	lb/MMCF	3.07E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Chromium	1.40E-03	lb/MMCF	3.91E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Manganese	3.80E-04	lb/MMCF	1.06E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Nickel	2.10E-03	lb/MMCF	5.86E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
	Total HAP (TPY)		0.05	

Methodology:

1) PTE (TPY) = Emission Factor (lb/MMCF) x Usage (MMCF/yr) x 1 ton / 2,000 lb
2) PTE (TPY) = Emission Factor (Kg/MMBtu) x 2.2 lb/Kg x Input Rate (MMBtu/hr) x 4.38 Ton-Hr/lb-yr
3) PTE (TPY as CO2e) = Emission Rate CO2 (TPY) + Emission Rate CH4 (TPY) x GWP CH4 + Emission Rate N2O (TPY) x GWP CH4
4) Gas Usage (MMCF/yr) = Heat Input (MMBtu/hr) x 1 MMCF/ 1,020 MMBtu x 8,760 hr/yr

Appendix A to the Technical Support Document (TSD)
Potential to Emit - Bar Furnace (2-5203B) - Natural Gas Combustion

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Heat Input Rate and Natural Gas Usage

Maximum Heat Input Rate	6.5	MMBtu/hr	and	55.82	MMCF/yr

Pollutant	Emission Factor		PTE (TPY)	Comments
PM	1.9	lb/MMCF	0.05	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM10	7.6	lb/MMCF	0.21	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
PM2.5	7.6	lb/MMCF	0.21	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
SO2	0.6	lb/MMCF	0.02	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
VOC	5.5	lb/MMCF	0.15	AP-42, Chapter 1.4, Table 1.4-2, 7/1998
CO	84	lb/MMCF	2.34	AP-42, Chapter 1.4, Table 1.4-1, 7/1998
NOx	100	lb/MMCF	2.79	AP-42, Chapter 1.4, Table 1.4-1, 7/1998

Greenhouse Gas Emissions (TPY as CO2e)

Pollutant	Emission Factor		PTE (TPY)	GWP	PTE as CO2e (TPY)	Comments
CO2	53.02	kg/MMBtu	3,321	1	3,321	40 CFR 98, Subpart C, Table C-1
CH4	1.00E-03	kg/MMBtu	0.0600	21	1.26	40 CFR 98, Subpart C, Table C-2
N2O	1.00E-04	kg/MMBtu	0.0063	310	1.95	40 CFR 98, Subpart C, Table C-2
		Total	3,321	Total	3,324	

HAP Emissions (TPY)

Pollutant	Emission Factor		PTE (TPY)	Comments
Benzene	2.10E-03	lb/MMCF	5.86E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Dichlorobenzene	1.20E-03	lb/MMCF	3.35E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Formaldehyde	7.50E-02	lb/MMCF	0.0021	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Hexane	1.8	lb/MMCF	**0.05**	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Toluene	3.40E-03	lb/MMCF	9.49E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Lead	5.00E-04	lb/MMCF	1.40E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Cadmium	1.10E-03	lb/MMCF	3.07E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Chromium	1.40E-03	lb/MMCF	3.91E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Manganese	3.80E-04	lb/MMCF	1.06E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
Nickel	2.10E-03	lb/MMCF	5.86E-05	AP-42, Chapter 1.4, Table 1.4-3, 7/1998
	Total HAP (TPY)		0.05	

Methodology:

1) PTE (TPY) = Emission Factor (lb/MMCF) x Usage (MMCF/yr) x 1 ton / 2,000 lb
2) PTE (TPY) = Emission Factor (Kg/MMBtu) x 2.2 lb/Kg x Input Rate (MMBtu/hr) x 4.38 Ton-Hr/lb-yr
3) PTE (TPY as CO2e) = Emission Rate CO2 (TPY) + Emission Rate CH4 (TPY) x GWP CH4 + Emission Rate N2O (TPY) x GWP CH4
4) Gas Usage (MMCF/yr) = Heat Input (MMBtu/hr) x 1 MMCF/ 1,020 MMBtu x 8,760 hr/yr

Appendix A to the Technical Support Document (TSD)
Emissions Summary - Line 4 W/ Quench Tank

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Line 4 Quench Tank - Potential to Emit (TPY)

Line 4 Quench Tank Throughput **5.25** **tons/hr**

Potential to Emit and Controlled Potential to Emit						
Pollutant	**Emission Factor**		**PTE (TPY)**	**Control Efficiency**	**Controlled PTE (TPY)**	**Comments**
PM	7	lb/ton	160.97	99.9%	0.16	Emission Factor from Mass Balance
PM10	7	lb/ton	160.97	99.9%	0.16	Emission Factor from Mass Balance
PM2.5	7	lb/ton	160.97	99.9%	0.16	Emission Factor from Mass Balance

Limited Potential to Emit						
Pollutant	**Permit Limit**		**Air Flow (SCFM)**	**Limited PTE (TPY)**	**Limited PTE (lb/hr)**	**Comments**
PM	0.03	gr/dscf	12,000	13.52	3.09	326 IAC 6.8-1-2(a) Limit
PM10	14.9	TPY		13.52	3.09	PSD Minor Limit
PM2.5	9.9	TPY		13.52	3.09	PSD Minor Limit

Methodology:

1) PTE (TPY) = Emission Factor (lb/ton) x Throughput (ton/hr) x 4.38 ton-hr/lb-yr
2) Controlled PTE (TPY) = Uncontrolled Emissions (TPY) x (1 - Control Efficiency)
3) PTE (TPY) = Pollutant Loading (gr/dscf) x Flow Rate (dscfm) x 60 min/hr x 4.38 ton-hr/lb-yr x 1 lb/7,000 gr

Notes:
1) The source conducted a stack test on January 20, 2012 on the existing shot peener and medium spring line quench tanks. These tests were intended to establish emission factors and control efficiencies or each unit. The emission protocol was submitted but not reviewed by IDEM before the stack test was conducted. Therefore, the emission factors used above are from the mass balance based on the amount of oil used and the weight of units treated. AP-42 emission factors will be used for the shot peener.
2) The applicant indicates VOC emissions from this unit are negligible. IDEM will verify with a one time test.

Appendix A to the Technical Support Document (TSD)
Emissions Summary - Two (2) Dip Tanks (2-2874A and 2-2874B) - Emissions for Each Unit

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

DIP Tanks (2-2874A and 2-2874B)

Protective Coating Used **4.5 gallon/hr**

Potential to Emit and Controlled Potential to Emit						
Pollutant	**Emission Factor**		**PTE (TPY)**	**Control Efficiency**	**Controlled PTE (TPY)**	**Comments**
PM	0		0	0.0%	0	Assume 100% Transfer
PM10	0		0	0.0%	0	Assume 100% Transfer
PM2.5	0		0	0.0%	0	Assume 100% Transfer
VOC	0.15	lb/gallon	2.96	0.0%	2.96	Assume 100% Volatilization

Limited Potential to Emit				
Pollutant	**Permit Limit**		**Limited PTE (TPY)**	**Comments**
PM	None		0	Limited Same as PTE - No Enforceable Limit
PM10	None		0	Limited Same as PTE - No Enforceable Limit
PM2.5	None		0	Limited Same as PTE - No Enforceable Limit
VOC	None		2.96	Limited PTE is same as PTE
VOC	2.8	lb/gallon	55.19	326 IAC 8-2-9(d)(1)(a)

Methodology:

1) PTE (TPY) = Emission Factor (lb/gallon) x Usage (gallons/hr) x 4.38 Ton-Hr/Lb-Year
2) Based on worst case coating.

Appendix A to the Technical Support Document (TSD)
Emissions Summary - Shot Peener (3-1826)

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Shot Peener (3-1826)

Throughput of Steel **5.25** **tons/hr**

Potential to Emit and Controlled Potential to Emit						
Pollutant	**Emission Factor**		**PTE (TPY)**	**Control Efficiency**	**Controlled PTE (TPY)**	**Comments**
PM	17	lb/ton	390.92	99.90%	0.39	SCC 3-04-003-40
PM10	1.7	lb/ton	39.09	99.90%	0.04	SCC 3-04-003-40
PM2.5	1.7	lb/ton	39.09	99.90%	0.04	SCC 3-04-003-40

Limited Potential to Emit					
Pollutant	**Permit Limit**		**Air Flow (SCFM)**	**Limited PTE (TPY)**	**Comments**
PM	0.03	gr/dscf	4,000	4.51	326 IAC 6.8-1-2(a) Limit
PM10	4.51	TPY		4.51	PSD Minor Limit
PM2.5	4.51	TPY		4.51	PSD Minor Limit

Methodology:

1) PTE (TPY) = Emission Factor (lb/ton) x Throughput (ton/hr) x 4.38 Ton-Hr/Lb-Year
2) PTE (TPY) = Limit (gr/dscf) x Flow (CFM) x 60 min/hr x 8,760 hr/yr x 1 lb/7,000 gr x 1 ton/2,000 lb
3) The source conducted a stack test on January 20, 2012 on the existing shot peener and medium spring line quench tanks. These tests were intended to establish emission factors and control efficiencies for each unit. The emission protocol was submitted but not reviewed by IDEM before the stack test was conducted. Therefore, the emission factors used above are from the mass balance based on the amount of oil used and the weight of units treated. AP-42 emission factors will be used for the shot peener.

Appendix A to the Technical Support Document (TSD)
Potential to Emit - GHG Prior Modification - Natural Gas Combustion

Company Name: Amsted Rail Company, Inc.
Address: 4831 Hohman Ave., Hammond, Indiana 46327-1579
Permit Number: SSM 089-31440-00204 & SPM 089-31498-00204
Reviewer: David Matousek
Date: March 23, 2012

Heat Input Rate and Natural Gas Usage

Emission Unit	Unit #	MMBtu/hr	
Large Line Bar Furnace	2-5027	20.5	
Medium Line Bar Furnace	2-5075	13.0	
Small Line Draw Furnace	2-5163	5.1	
Medium Line Draw Furnace	2-5097	5.1	
Large Line Draw Furnace	2-5164	9.8	
Small Line Bar Furnace	2-5085	8.0	
Small Line Slot Furnace	2-5006	1.5	
Medium Line Slot Furnaces	2-5014/2-5015	5.2	
Large Line Slot Furnace	2-5036	2.5	
		70.7	MMBtu/hr

Maximum Heat Input Rate	**70.7**	**MMBtu/hr**	**and**	**607.19**	**MMCF/yr**

Greenhouse Gas Emissions (TPY as CO2e)

Pollutant	Emission Factor		PTE (TPY)	GWP	PTE as CO2e (TPY)	Comments
CO2	53.02	kg/MMBtu	36,121	1	36,121	40 CFR 98, Subpart C, Table C-1
CH4	1.00E-03	kg/MMBtu	0.6800	21	14.28	40 CFR 98, Subpart C, Table C-2
N2O	1.00E-04	kg/MMBtu	0.0681	310	21.11	40 CFR 98, Subpart C, Table C-2
		Total	36,122	Total	36,156	

Methodology:

1) PTE (TPY) = Emission Factor (lb/MMCF) x Usage (MMCF/yr) x 1 ton / 2,000 lb
2) PTE (TPY) = Emission Factor (Kg/MMBtu) x 2.2 lb/Kg x Input Rate (MMBtu/hr) x 4.38 Ton-Hr/lb-yr
3) PTE (TPY as CO2e) = Emission Rate CO2 (TPY) + Emission Rate CH4 (TPY) x GWP CH4 + Emission Rate N2O (TPY) x GWP CH4
4) Gas Usage (MMCF/yr) = Heat Input (MMBtu/hr) x 1 MMCF/ 1,020 MMBtu x 8,760 hr/yr

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: Robert Ribbing
Amsted Rail Company, Inc.
1700 Walnut St
Granite City, IL 62040

DATE: July 2, 2012

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

SUBJECT: Final Decision
Title V
089-31440-00204

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:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

July 2, 2012

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: 089-31440-00204

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

Mail Code 61-53

IDEM Staff	CDENNY 7/2/2012 Amsted Rail Company, Inc. 089-31440-00204 (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		Robert Ribbing Amsted Rail Company, Inc. 1700 Walnut St Granite City IL 62040 (Source CAATS)									
2		David Sutherland Plant Mgr Amsted Rail Company, Inc. 4831 Hohman Ave Hammond IN 46327 *(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		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 *(Affected Party)*									
10		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 *(Affected Party)*									
11		Mark Coleman 107 Diana Road Portage IN 46368 *(Affected Party)*									
12		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 *(Affected Party)*									
13		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)									
14		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 *(Local Official)*									
15		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 *(Affected Party)*									

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.

FACSIMILIE OF PS Form 3877

Mail Code 61-53

IDEM Staff	CDENNY 7/2/2012 Amsted Rail Company, Inc. 089-31440-00204 (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		Barbara G. 506 Lilac Street East Chicago IN 46312 (Affected Party)									
2		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 *(Affected Party)*									
3		Tom Rarick Environmental Resources Management (ERM) 11350 N Meridian Suite 320 Carmel IN 46032 *(Consultant)*									
4		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 *(Affected Party)*									
5		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 *(Affected Party)*									
6		Gary City Council 401 Broadway # 209 Gary IN 46402 *(Local Official)*									
7		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 *(Local Official)*									
8		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 *(Affected Party)*									
9		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 *(Affected Party)*									
10		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 *(Local Official)*									
11		Jerry Sladek 1834 Summer Street Hammond IN 46320 *(Affected Party)*									
12											
13											
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.

FACSIMILIE OF PS Form 3877