



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 13, 2012

RE: Stanrail, a division of Roll Form Group US Inc / 089-32000-00406

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Stanrail, a division of Roll Form Group (U.S.) Inc.  
1225 Martin Luther King Drive  
Gary, Indiana 46402**

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

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

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

Operation Permit No.: M089-32000-00406	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 13, 2012 Expiration Date: August 13, 2022

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## SECTION A SOURCE SUMMARY

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

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

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

Source Address:	1225 Martin Luther King Drive, Gary, Indiana 46402
General Source Phone Number:	(219) 932-5200
SIC Code:	3743 (Railroad Equipment)
County Location:	Lake
Source Location Status:	Non-attainment for 1-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) dip coating operation for nailable steel channels for railcar flooring, identified as Line 3, consisting of the following:
- (1) One (1) dip tank located in the paint drying room, applying extreme performance coatings, identified as Line 3 dip tank, installed in 1995, capacity: forty (40) steel floor channels per hour.
  - (2) One (1) conveyor line, identified as Line 3 conveyor line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.
- Note: There are no emissions associated with the conveyor line.
- (3) One (1) welding station, identified as Line 3 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: five (5) pounds of wire per hour, each.
- (b) One (1) dip coating operation for uncoupling levers, identified as Line 4, installed in 2003, consisting of the following:
- (1) Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.
  - (2) One (1) conveyor line.
- Note: There are no emissions associated with the conveyor line.
- (3) One (1) robotic MIG welding station.

- (c) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
  - (1) One (1) metal boxcar parts surface coating spray booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
  - (2) One conveyor line installed in 2007.  
  
Note: There are no emissions associated with the conveyor line.
  - (3) One degreasing station used to clean the doors prior to coating. This degreasing station uses a non VOC solvent.
  - (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- (d) One (1) Small Parts coating booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings, with a maximum capacity of 1 gallon of coating applied per hour when coating small parts, with particulate emission controlled by a dry filter system exhausting through Stack V-2. The booth is primarily used for coating small parts for rail cars; however, the booth may also be used for coating rail bogies or other large pieces when necessary, with a maximum capacity of 1.25 gallons of coating per hour.
- (e) One (1) coating booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings, identified as Pit Building Spray Booth, with a maximum capacity of 0.21 gallons of coating applied per hour when coating metal life shelters, with particulate emission controlled by a dry filter system exhausting through Stack 8.
- (f) Thirty-three (33) MIG welders.
- (g) One (1) electric resistance welder with no emissions, installed in 2000.
- (h) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) plasma cutting torches (capacity: less than or equal to 0.375 inch thick steel cut at one hundred fifty (150) inches per minute), and six (6) oxy fuel cutting torches (capacity: less than or equal to 2.5 inch thick steel cut at twenty (20) inches per minute), installed in 2001.
- (i) One (1) rollform area, installed in 1996, consisting of:
  - (1) Two (2) rollformers equipped with electric motors with no emissions.
  - (2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.
  - (3) Uncoilers.
- (j) Four (4) storage tanks, consisting of:
  - (1) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.

- (2) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
  - (3) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
  - (4) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.
- (k) Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, M089-32000-00406, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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

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

### B.5 Severability

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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

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

### B.7 Duty to Provide Information

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M089-32000-00406 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

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

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

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

**B.14 Source Modification Requirement**

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

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

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

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

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

**B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.18 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

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

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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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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

**Corrective Actions and Response Steps**

**C.13 Response to Excursions or Exceedances**

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

#### **C.15 Malfunctions Report [326 IAC 1-6-2]**

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

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

#### **C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

#### **C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) dip coating operation for nailable steel channels for railcar flooring, identified as Line 3, consisting of the following:
- (1) One (1) dip tank located in the paint drying room, applying extreme performance coatings, identified as Line 3 dip tank, installed in 1995, capacity: forty (40) steel floor channels per hour.
  - (2) One (1) conveyor line, identified as Line 3 conveyor line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.  
  
Note: There are no emissions associated with the conveyor line.
  - (3) One (1) welding station, identified as Line 3 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: five (5) pounds of wire per hour, each.
- (b) One (1) dip coating operation for uncoupling levers, identified as Line 4, installed in 2003, consisting of the following:
- (1) Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.
  - (2) One (1) conveyor line.  
  
Note: There are no emissions associated with the conveyor line.
  - (3) One (1) robotic MIG welding station.
- (c) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
- (1) One (1) metal boxcar parts surface coating spray booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
  - (2) One conveyor line installed in 2007.  
  
Note: There are no emissions associated with the conveyor line.
  - (3) One degreasing station used to clean the doors prior to coating. This degreasing station uses a non VOC solvent.
  - (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- (d) One (1) Small Parts coating booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings, with a maximum capacity of 1 gallon of coating applied per hour when coating small parts, with particulate emission controlled by a dry filter system exhausting through Stack V-2. The booth is primarily used for coating small parts for

	rail cars; however, the booth may also be used for coating rail bogies or other large pieces when necessary, with a maximum capacity of 1.25 gallons of coating per hour.
(e)	One (1) coating booth, using high volume low-pressure (HVL) spray equipment, applying extreme performance coatings, identified as Pit Building Spray Booth, with a maximum capacity of 0.21 gallons of coating applied per hour when coating metal life shelters, with particulate emission controlled by a dry filter system exhausting through Stack 8.
(f)	Thirty-three (33) MIG welders.
(g)	One (1) electric resistance welder with no emissions, installed in 2000.
(h)	One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) plasma cutting torches (capacity: less than or equal to 0.375 inch thick steel cut at one hundred fifty (150) inches per minute), and six (6) oxy fuel cutting torches (capacity: less than or equal to 2.5 inch thick steel cut at twenty (20) inches per minute), installed in 2001.
(i)	One (1) rollform area, installed in 1996, consisting of: <ul style="list-style-type: none"><li>(1) Two (2) rollformers equipped with electric motors with no emissions.</li><li>(2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.</li><li>(3) Uncoilers.</li></ul>
(j)	Four (4) storage tanks, consisting of: <ul style="list-style-type: none"><li>(1) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.</li><li>(2) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.</li><li>(3) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.</li><li>(4) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.</li></ul>
(k)	Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)	

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

**D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-7]**

In order to render the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties) not applicable, the VOC input to the surface coating facilities (identified as Line 3, Line 4, Line 6, Small Parts Booth, and Pit Building Spray Booth), shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere of VOCs in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the dip coating line, identified as Line 3.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray coating line, identified as Small Parts Booth, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, each, for extreme performance coatings.

#### D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### D.1.4 Particulate Matter [326 IAC 6.8]

- (a) Pursuant 326 IAC 6.8-1-2(a), particulate matter emissions from the paint the dip coating Line 3, the dip coating Line 4, the Line 6 Spray Booth, the Small Parts Spray Booth, and the Pit Building Spray Booth shall not exceed of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf), each.
- (b) Pursuant 326 IAC 6.8-1-2(a), particulate matter emissions from each of the welding operations and flame cuttings operations shall not exceed of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf).
- (c) Pursuant to 326 IAC 6.8-1-2(b)(2), particulate matter emissions from each combustion unit (including 45 space heaters, and one (1) water heater, one (1) dry off oven, and one (1) curing oven for Line 6) shall not exceed twenty-seven hundredths (0.27) gram per million kcal (fifteen-hundredths (0.15) pound per million Btu).

#### D.1.5 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan is required for the Line 6 Spray Booth, the Small Parts Spray Booth, and the Pit Building Spray Booth, and their control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

## Compliance Determination Requirements

### D.1.6 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC 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.1.7 Particulate Control

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In order to comply with Conditions D.1.4(a), the dry filter system control devices shall each be in operation and control emissions from the Line 6 Spray Booth, the Small Parts Spray Booth, and the Pit Building Spray Booth at all times that the Line 6 Spray Booth, the Small Parts Spray Booth, and the Pit Building Spray Booth are each in operation.

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

### D.1.8 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray paint booth stacks while the spray paint booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

### D.1.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on month basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

- (3) The cleanup solvent usage for month;
  - (4) The VOC usage for each month; and
  - (5) The calculated VOC per gallon of coating, less water.
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.10 Record Keeping Requirements [326 IAC 8-9-6]

- (a) Pursuant to 326 IAC 8-9-6, the following records shall be maintained for the life of the one (1) propylene storage tank:
- (1) The vessel identification number.
  - (2) The vessel dimensions.
  - (3) The vessel capacity.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Stanrail, a division of Roll Form Group (U.S.) Inc.
<b>Address:</b>	1225 Martin Luther King Drive
<b>City:</b>	Gary, Indiana 46402
<b>Phone #:</b>	(219) 932-5200
<b>MSOP #:</b>	M089-32000-00406

I hereby certify that Stanrail, a division of Roll Form Group (U.S.) Inc. is:  still in operation.

no longer in operation.

I hereby certify that Stanrail, a division of Roll Form Group (U.S.) Inc. is:  in compliance with the requirements of MSOP M089-32000-00406.

not in compliance with the requirements of MSOP M089-32000-00406.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

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

**MSOP Quarterly Report**

Source Name: Stanrail, a division of Roll Form Group (U.S.) Inc.  
Source Address: 1225 Martin Luther King Drive, Gary, Indiana 46402  
MSOP Permit No.: M089-32000-00406  
Facility: All surface coating activities facilities (identified as Line 3, Line 4, Line 6, Small Parts Booth, and Pit Building Spray Booth)  
Parameter: VOC  
Limit: The VOC input to the surface coating facilities shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Addendum to the Technical Support Document (ATSD) for a  
Minor Source Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Stanrail, a division of Roll Form Group (U.S.) Inc.</b>
<b>Source Location:</b>	<b>1225 Martin Luther King Drive, Gary, Indiana 46402</b>
<b>County:</b>	<b>Lake</b>
<b>SIC Code:</b>	<b>3743 (Railroad Equipment)</b>
<b>Permit Renewal No.:</b>	<b>M089-32000-00406</b>
<b>Permit Reviewer:</b>	<b>Sarah Street</b>

On July 9, 2012, the Office of Air Quality (OAQ) had a notice published in The Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana, stating that Stanrail, a division of Roll Form Group (U.S.) Inc. had applied for a MSOP Renewal to continue to operate its existing stationary rail car parts fabrication and painting source. The notice also stated that the OAQ proposed to issue a MSOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

No comments were received during the public notice period.

**County Attainment Status**

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes, as described below.

Lake County has been re-classified as nonattainment for ozone (O<sub>3</sub>). Pursuant to 326 IAC 1-4-46, the following table summarizes the Lake County Attainment Status, effective August 9, 2012.

The source is located in Lake County.

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	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; 148 <sup>th</sup> 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 <sub>3</sub>	40 CFR 81.315 as amended by 77 FR 34228. <sup>1,2</sup>
PM <sub>10</sub>	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 <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
PM <sub>2.5</sub>	Attainment effective February 6, 2012, for the annual PM <sub>2.5</sub> standard.
<sup>1</sup> Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005.	
<sup>2</sup> The department is filing a legal challenge to U.S. EPA's designation in 77 FR 34228 and seeking a stay of effectiveness of this designation.	

**Ozone Standards**

U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM, does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO<sub>x</sub> emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

IDEM, OAQ has decided to make revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) Lake County has been re-classified as non-attainment for the 1-hour ozone standard, therefore, Source Location Status in Section A.1 has been revised as follows:

...

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

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

Source Address:	1225 Martin Luther King Drive, Gary, Indiana 46402
General Source Phone Number:	(219) 932-5200
SIC Code:	3743 (Railroad Equipment)
County Location:	Lake
Source Location Status:	<b>Non-attainment for 1-hour ozone standard</b>
Source Status:	Attainment for all <b>other</b> criteria pollutants Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

...

<b>Unrestricted Potential Emissions</b>
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This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	73.15
PM <sub>10</sub>	73.44
PM <sub>2.5</sub>	73.44
SO <sub>2</sub>	0.03
VOC	15.57
CO	4.33
NO <sub>x</sub>	5.15
GHGs as CO <sub>2</sub> e	6,221

Unrestricted Potential Emissions	
Pollutant	Tons/year
Single HAP	0.41 Mn
Total HAP	0.51

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit all nonattainment regulated pollutants (NO<sub>x</sub> and VOCs) are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

**Potential to Emit After Issuance**

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

Since Lake County has been re-classified as nonattainment for ozone, the Emission Offset thresholds have been added to the Potential to Emit of the Entire Source After Issuance of Renewal table:

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Surface Coating	55.45	55.45	55.45	-	-	15.29	-	-	0.00	0.00
Welding & Flame Cutting	17.60	17.60	17.60	-	-	-	-	-	0.41	0.41 Mn
Natural Gas Combustion	0.10	0.39	0.39	0.03	5.15	0.28	4.33	6,221	0.10	0.093 Hexane
<b>Total PTE of Entire Source</b>	<b>73.15</b>	<b>73.44</b>	<b>73.44</b>	<b>0.03</b>	<b>5.15</b>	<b>15.57</b>	<b>4.33</b>	<b>6,221</b>	<b>0.51</b>	<b>0.41 Mn</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO <sub>2</sub> e	25	10
PSD Major Source Thresholds	250	250	250	250	NA	NA	250	100,000 CO <sub>2</sub> e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM <sub>10</sub> ), not particulate matter (PM), is considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .										

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not in one of the twenty-eight (28) listed source categories.

- (b) This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit all nonattainment regulated pollutants (NOx and VOCs) are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed MSOP Renewal can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Stanrail, a division of Roll Form Group (U.S.) Inc.</b>
<b>Source Location:</b>	<b>1225 Martin Luther King Drive, Gary, Indiana 46402</b>
<b>County:</b>	<b>Lake</b>
<b>SIC Code:</b>	<b>3743 (Railroad Equipment)</b>
<b>Permit Renewal No.:</b>	<b>M089-32000-00406</b>
<b>Permit Reviewer:</b>	<b>Sarah Street</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Stanrail, a division of Roll Form Group (U.S.) Inc. relating to the operation of a stationary rail car parts fabrication and painting source. On June 11, 2012, Stanrail, a division of Roll Form Group (U.S.) Inc. submitted an application to the OAQ requesting to renew its operating permit. Stanrail, a division of Roll Form Group (U.S.) Inc. was issued its MSOP M089-24690-00406 on October 11, 2007.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) dip coating operation for nailable steel channels for railcar flooring, identified as Line 3, consisting of the following:
- (1) One (1) dip tank located in the paint drying room, applying extreme performance coatings, identified as Line 3 dip tank, installed in 1995, capacity: forty (40) steel floor channels per hour.
  - (2) One (1) conveyor line, identified as Line 3 conveyor line, installed in 1995, with maximum conveying capacity of 3,525 pounds of steel parts per hour.  
  
Note: There are no emissions associated with the conveyor line.
  - (3) One (1) welding station, identified as Line 3 welding station, consisting of two (2) MIG welders, installed in 1996, capacity: five (5) pounds of wire per hour, each.
- (b) One (1) dip coating operation for uncoupling levers, identified as Line 4, installed in 2003, consisting of the following:
- (1) Two (2) interchangeable dip tanks applying extreme performance coatings, capacity: three hundred fifty (350) units per 7.5 hour shift. Each unit consists of three (3) pieces: a hood, a handle, and a center piece.
  - (2) One (1) conveyor line.  
  
Note: There are no emissions associated with the conveyor line.
  - (3) One (1) robotic MIG welding station.

- (c) One (1) surface coating operation identified as Line 6, constructed in 2007, and consisting of the following:
  - (1) One (1) metal boxcar parts surface coating spray booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings with a maximum production rate of 4 units per hour, with particulate emissions controlled by a dry filter system, and exhausting through Line 6 Stack.
  - (2) One conveyor line installed in 2007.  
  
Note: There are no emissions associated with the conveyor line.
  - (3) One degreasing station used to clean the doors prior to coating. This degreasing station uses a non VOC solvent.
  - (4) Three (3) natural gas combustion units including one (1) water heater, one (1) dry off oven following the washer, and one (1) curing oven following the spray booth, each rated at maximum heat input capacity of 1.0 MMBtu per hour.
- (d) One (1) Small Parts coating booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings, with a maximum capacity of 1 gallon of coating applied per hour when coating small parts, with particulate emission controlled by a dry filter system exhausting through Stack V-2. The booth is primarily used for coating small parts for rail cars; however, the booth may also be used for coating rail bogies or other large pieces when necessary, with a maximum capacity of 1.25 gallons of coating per hour.
- (e) One (1) coating booth, using high volume low-pressure (HVLP) spray equipment, applying extreme performance coatings, identified as Pit Building Spray Booth, with a maximum capacity of 0.21 gallons of coating applied per hour when coating metal life shelters, with particulate emission controlled by a dry filter system exhausting through Stack 8.
- (f) Thirty-three (33) MIG welders.
- (g) One (1) electric resistance welder with no emissions, installed in 2000.
- (h) One (1) oxyacetylene burning machine, identified as Burning Table, consisting of two (2) plasma cutting torches (capacity: less than or equal to 0.375 inch thick steel cut at one hundred fifty (150) inches per minute), and six (6) oxy fuel cutting torches (capacity: less than or equal to 2.5 inch thick steel cut at twenty (20) inches per minute), installed in 2001.
- (i) One (1) rollform area, installed in 1996, consisting of:
  - (1) Two (2) rollformers equipped with electric motors with no emissions.
  - (2) Two (2) cutoff presses with capacities of 150 to 200 tons with no emissions.
  - (3) Uncoilers.
- (j) Four (4) storage tanks, consisting of:
  - (1) One (1) liquid oxygen storage tank, identified as AGA-1, installed in 1998, capacity: 1,500 gallons of liquid oxygen.

- (2) One (1) liquid nitrogen storage tank, identified as WS-1, installed in 2003, capacity: 1,500 gallons of liquid nitrogen.
- (3) One (1) argon storage tank, identified as WS-2, installed in 2003, capacity: 1,500 gallons of argon.
- (4) One (1) propylene storage tank, identified as WS-3, installed in 2003, capacity: 1,000 gallons of propylene.
- (k) Forty five (45) natural gas fired space heaters, each rated maximum heat input capacity of 0.20 MMBtu/hr.

There are no new units in this renewal.

There are no existing units that have been removed from this source.

#### **Existing Approvals**

Since the issuance of the MSOP 089-24690-00406 on October 11, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Notice-Only Change No. 089-26210-00406 issued on March 11, 2008; and
- (b) Notice-Only Change No. 089-26724-00406 issued on August 7, 2008.

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

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

#### **County Attainment Status**

The source is located in Lake County.

Pollutant	Designation
SO <sub>2</sub>	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; 148 <sup>th</sup> 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 <sub>3</sub>	Attainment effective May 11, 2010, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	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 <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
PM <sub>2.5</sub>	Attainment effective February 6, 2012, for the annual PM <sub>2.5</sub> standard.
<sup>1</sup> 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.	

- (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<sub>2.5</sub>**  
 Lake County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. On February 1, 2012, the air pollution control board passed the Northwest Indiana PM<sub>2.5</sub> Redesignation emergency rule to redesignate to attainment Lake County and Porter County. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> 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 all other criteria pollutants. 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.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	73.15
PM <sub>10</sub>	73.44
PM <sub>2.5</sub>	73.44
SO <sub>2</sub>	0.03
VOC	15.57
CO	4.33
NO <sub>x</sub>	5.15
GHGs as CO <sub>2</sub> e	6,221
Single HAP	0.41 Mn
Total HAP	0.51

See Appendix A of this TSD for detailed calculations.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, PM, PM<sub>10</sub> and PM<sub>2.5</sub> are each equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

<b>Actual Emissions</b>
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No previous emission data has been received from the source.

<b>Potential to Emit After Issuance</b>
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The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Surface Coating	55.45	55.45	55.45	-	-	15.29	-	-	0.00	0.00
Welding & Flame Cutting	17.60	17.60	17.60	-	-	-	-	-	0.41	0.41 Mn
Natural Gas Combustion	0.10	0.39	0.39	0.03	5.15	0.28	4.33	6,221	0.10	0.093 Hexane
<b>Total PTE of Entire Source</b>	<b>73.15</b>	<b>73.44</b>	<b>73.44</b>	<b>0.03</b>	<b>5.15</b>	<b>15.57</b>	<b>4.33</b>	<b>6,221</b>	<b>0.51</b>	<b>0.41 Mn</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO <sub>2</sub> e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO <sub>2</sub> e	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .										

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset because Lake County is an attainment county.

**Federal Rule Applicability**

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb (326 IAC 12), are still not applicable for the four (4) storage tanks (AGA-1, WS-1, WS-2, and WS-3), because although each tank was constructed after the rule applicability date of July 23, 1984, each tank has a maximum capacity of less than 75 m<sup>3</sup> (19,813 gallons), and the liquid stored in each tank has a maximum true vapor pressure of less than fifteen kiloPascals (15.0 kPa).
- (b) This requirements of the New Source Performance Standard Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are still not included in the permit, because this source coats rail car parts, not automobiles or light-duty trucks.
- (c) There are still no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) This source is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85), because this source is not a major source of HAPs as

- defined in 40 CFR 63.2 and does not surface coat automobiles or light-duty trucks as defined by 63.3176. This source coats rail car parts.
- (b) This source is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm (326 IAC 20-88), pursuant to 40 CFR 63.3881(b) because this source is not a major source of HAPs as defined in 40 CFR 63.2.
  - (c) This source is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, because, although this source is an area source of HAPs, this source is not involved in the use of chemical strippers that contain methyl chloride (MeCl) in paint removal processes and the surface coatings used at this source do not contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
  - (d) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability - Entire Source</b>
---

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Unrestricted Potential Emissions section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO<sub>2</sub>e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset)  
This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the Lake County is an attainment county. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70); and, although it is located in Lake County, this source has actual emissions of NO<sub>x</sub> and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.

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

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

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

(h) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)  
This source is subject to 326 IAC 6.8-1-2 because it is located in Lake County; and, although it is not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11, this source actual emissions greater than ten (10) tons per year of particulate matter.

- (1) Surface Coating  
Pursuant 326 IAC 6.8-1-2(a), particulate matter emissions from the paint the dip coating Line 3, the dip coating Line 4, the Line 6 Spray Booth, the Small Parts Spray Booth, and the Pit Building Spray Booth shall not exceed of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf), each.

The surface coating paint booths shall be controlled by a dry particulate filter. The control efficiency of the dry filters shall not be less than 80%.

Note: This is a new requirement. These changes include Title 1 changes.

- (2) Welding and Flame-Cutting  
Pursuant 326 IAC 6.8-1-2(a), particulate matter emissions from each of the welding operations and flame cuttings operations shall not exceed of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf).

Note: This is a new requirement. These changes include Title 1 changes.

- (3) Combustion Units  
Pursuant to 326 IAC 6.8-1-2(b)(2), particulate matter emissions from each combustion unit (including 45 space heaters, and one (1) water heater, one (1) dry off oven, and one (1) curing oven for Line 6) shall not exceed twenty-seven hundredths (0.27) gram per million kcal (fifteen-hundredths (0.15) pound per million Btu).

Note: This is a new requirement. These changes include Title 1 changes.

The PM emission limitations under 326 IAC 6.8 are summarized in the table below:

<b>Emission Unit</b>	<b>326 IAC 6.8 Allowable PM Emission Rate</b>
Dip coating Line 3	0.03 gr/dscf
Dip coating Line 4	0.03 gr/dscf
Spray coating Line 6	0.03 gr/dscf
Small Parts coating booth	0.03 gr/dscf
Pit Building Spray Booth	0.03 gr/dscf
Each Welding and Flame Cutting Operation	0.03 gr/dscf
Each Combustion Unit	0.15 lb/MMBtu

- (i) 326 IAC 6.8-2 (Lake County: PM10 Emission Requirements)  
 This source is located in Lake County and is not specifically listed in 326 IAC 6.8-2-3 through 326 IAC 6.8-2-38. Therefore, 326 IAC 6.8-2 (Lake County PM10 Emission Requirements) does not apply.
- (j) 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)  
 This source is still not subject to the requirements of 326 IAC 6.8-10, because, although this source is located in Lake County, it does not have the potential to emit greater than five (5) tons per year fugitive particulate matter. This determination was made under MSOP No. 089-24690-00406, issued October 11, 2007.
- (k) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)  
 Pursuant to 326 IAC 8-7-2(a), the requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that have coating facilities which emit or have the potential to emit a total equal to or greater than ten (10) tons per year of VOCs.

In order to render the requirements of 326 IAC 8-7 not applicable, the VOC input to the surface coating facilities (identified as Line 3, Line 4, Line 6, Small Parts Booth, and Pit Building Spray Booth), shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: This 326 IAC 8-7 avoidance limit has been added with this renewal. This change is a Title 1 change.

<b>State Rule Applicability – Individual Facilities</b>
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**Surface Coating**

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 The requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), are not applicable to this source because the source is subject to 326 IAC 6.8-1-2.

Note: Prior permit approvals included the requirements for 326 IAC 6-3-2(d) for the surface coating units, which have been removed with this renewal. These changes include Title 1 changes.

- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
 The surface coating dip tanks and spray booths are not subject to the requirements of 326 IAC 8-1-6, because this source is subject to the VOC requirements under 326 IAC 8-2-9 (Miscellaneous

Metal Coating Operations), and each booth has a potential to emit of less than 25 tons per year VOCs.

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

- (1) The one (1) dip coating line, identified as Line 3, located in Lake County, has the unrestricted potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the Line 3 is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOCs in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the dip coating line, identified as Line 3.

Based on the MSDS submitted by the source and calculations made, the Line 3 will be able to comply with the rule requirement. See Appendix A for detailed calculations.

Note: In prior permit approvals, only the Small Parts Booth has been subject to 326 IAC 8-2-9. This change is a Title 1 change.

- (2) Pursuant to 326 IAC 8-2-9(a)(5), the one (1) dip coating line, identified as Line 4, located in Lake County, is still not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the Line 4 has potential emissions less than fifteen (15) pounds of VOC per day before add-on controls.
- (3) Pursuant to 326 IAC 8-2-9(a)(5), the one (1) spray booth, identified as Line 6, located in Lake County, is still not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the Line 6 has potential emissions less than fifteen (15) pounds of VOC per day before add-on controls.
- (4) The one (1) spray coating line, identified as Small Parts Booth, located in Lake County, has the unrestricted potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the Small Parts Booth is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the Small Parts Booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Based on the MSDS submitted by the source and calculations made, the Line 3 will be able to comply with the rule requirement. See Appendix A for detailed calculations.

Note: This is an existing requirement.

- (5) Pursuant to 326 IAC 8-2-9(a)(5), the one (1) spray booth, identified as Pit Building Spray Booth, located in Lake County, is still not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the Pit Building Spray Booth has potential emissions less than fifteen (15) pounds of VOC per day before add-on controls.
- (6) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
- (i) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

- (ii) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (iii) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (iv) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (v) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Note: This is an existing requirement.

### **Welding and Flame Cutting**

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), are not applicable to this source because the source is subject to 326 IAC 6.8-1-2.

### **Combustion Units**

- (a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
The natural gas-fired heaters, dry off oven, curing oven, and water heater are still not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
The requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), are not applicable to this source because the source is subject to 326 IAC 6.8-1-2.

### **Degreasing**

- (a) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
The source switched to a non-VOC solvent in the degreasing operation, with Notice-Only Change No. 089-26210-00406, issued March 11, 2008. Since the degreasing station no longer uses an organic solvent, the requirements of 326 IAC 8-3 are still no longer applicable to the degreasing operation and are not included in this permit renewal.

### **Storage Tanks**

- (a) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each storage tank is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each storage tank is less than twenty-five (25) tons per year.
- (b) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)  
The four (4) storage tanks are not subject to the requirements of 326 IAC 8-4-3 because they are not petroleum liquid storage vessels with capacities greater than thirty-nine thousand (39,000) gallons, each.
- (c) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)  
Pursuant to 326 IAC 8-9-1(b), the one (1) propylene storage tank, identified as WS-3, is subject to the record keeping and reporting requirements of 326 IAC 8-9-6(a) and (b) because the one (1)

propylene storage tank has a storage capacity less than 39,000 gallons, stores volatile organic liquid and is located in Lake County. Therefore, the following records shall be maintained for the life of the one (1) propylene storage tank:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

Note: This is an existing requirement.

Note: The one (1) liquid oxygen storage tank, identified as AGA-1, the one (1) liquid nitrogen storage tank, identified as WS-1, and the one (1) argon storage tank, identified as WS-2, are each still not subject to the requirements of this rule, because these storage tanks do not store organic liquid which can emit volatile organic compounds (as defined in 40 CFR 51.100) into the atmosphere.

**Compliance Determination and Monitoring Requirements**

- (a) The compliance monitoring requirements applicable to this source are as follows:

Emission Unit	Control	Parameter	Frequency	Range	Excursions and Exceedances
Spray Paint booths  (Line 6 Spray Booth, the Small Parts Spray Booth, and the Pit Building Spray Booth)	dry filters	Filter inspection	Daily	Normal-Abnormal	Response Steps
		Stack exhaust inspection	Monthly		
		Presence of overspray	Monthly		

These compliance monitoring requirements are necessary to ensure compliance with the 326 IAC 6.8 particulate emissions limitations. The dip coating operations (Line 3 and Line 4) do not use dry filters for control.

In order to document the compliance status with the emissions limitation standard for VOC input to the surface coating facilities, a quarterly summary of the information shall be submitted using the reporting forms located at the end of the permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported.

- (b) There are no testing requirements applicable to this source with this permit renewal.

**Recommendation**

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

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

An application for the purposes of this review was received on June 11, 2012.

### Conclusion

The operation of this stationary rail car parts fabrication and painting source shall be subject to the conditions of the attached MSOP Renewal No. 089-32000-00406.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (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](http://www.idem.in.gov)

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Stanrail, a division of Roll Form Group (U.S.) Inc.  
**Address City IN Zip:** 1225 Martin Luther King Drive, Gary, Indiana 46402  
**Permit Number:** M089-32000-00406  
**Plt ID:** 089-00406  
**Reviewer:** Sarah Street  
**Date:** 6/12/2012

Potential to Emit (tons/yr)										
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Worst Single HAP	Total HAPs
Surface Coating	55.45	55.45	55.45	-	-	15.29	-	-	0.00	0.00
Welding & Flame Cutting	17.60	17.60	17.60	-	-	-	-	-	0.41 Mn	0.41
Natural Gas Combustion	0.10	0.39	0.39	0.03	5.15	0.28	4.33	6,221	0.093 Hexane	0.10
<b>TOTAL</b>	<b>73.15</b>	<b>73.44</b>	<b>73.44</b>	<b>0.03</b>	<b>5.15</b>	<b>15.57</b>	<b>4.33</b>	<b>6,221</b>	<b>0.41 Mn</b>	<b>0.51</b>

Limited/Controlled Potential to Emit (tons/yr)										
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Worst Single HAP	Total HAPs
Surface Coating*	1.66	1.66	1.66	-	-	<10.00	-	-	0.00	0.00
Welding & Flame Cutting	17.60	17.60	17.60	-	-	-	-	-	0.41 Mn	0.41
Natural Gas Combustion	0.10	0.39	0.39	0.03	5.15	0.28	4.33	6,221	0.093 Hexane	0.10
<b>TOTAL</b>	<b>19.36</b>	<b>19.66</b>	<b>19.66</b>	<b>0.03</b>	<b>5.15</b>	<b>&lt;10.28</b>	<b>4.33</b>	<b>6,221</b>	<b>0.41 Mn</b>	<b>0.51</b>

\*PM/PM10/PM2.5 emissions after controls. VOC limit to avoid requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Stanrail, a division of Roll Form Group (U.S.) Inc.  
**Address City IN Zip:** 1225 Martin Luther King Drive, Gary, Indiana 46402  
**Permit Number:** M089-32000-00406  
**Plt ID:** 089-00406  
**Reviewer:** Sarah Street  
**Date:** 6/12/2012

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency		
<b>Line 3 Dip Tank - AS APPLIED</b>																		
304R3 red primer	9.14	79.64%	70.57%	9.07%	74.32%	13.98%	0.02400	40.000	3.23	0.83	0.796	19.099	3.486	0.000	5.93	100%		
<b>Line 4 Dip Tank - AS SUPPLIED</b>																		
328Y2 yellow	10.00	59.14%	54.85%	4.29%	63.13%	31.25%	0.00800	46.700	1.16	0.43	0.160	3.847	0.702	0.000	1.37	100%		
328B1 blue	9.16	61.82%	56.46%	5.36%	59.99%	33.50%	0.00800	46.700	1.23	0.49	0.183	4.402	0.803	0.000	1.47	100%		
<b>Line 6 Spray Booth - AS SUPPLIED</b>																		
300R6 red primer	10.83	40.30%	39.70%	0.60%	52.40%	46.70%	1.20000	4.000	0.14	0.06	0.312	7.486	1.366	47.576	0.14	65%		
<b>Small Parts Booth - AS SUPPLIED</b>																		
324A3 black	8.33	69.48%	50.49%	18.54%	52.34%	25.98%	2.50000	0.500	3.24	1.54	1.930	46.331	8.455	4.872	5.94	65%		
304R1D red primer	10.00	59.08%	46.89%	12.19%	54.77%	28.31%	1.00000	1.000	2.70	1.22	1.219	29.256	5.339	6.273	4.31	65%		
<b>Pit Building - AS SUPPLIED</b>																		
LX0720	10.03	50.43%	46.63%	2.93%	56.45%	39.02%	5.00000	0.042	0.67	0.29	0.062	1.481	0.270	1.60	0.75	65%		
LX0719	10.03	57.34%	43.55%	12.79%	53.51%	28.56%	5.00000	0.042	2.76	1.28	0.269	6.465	1.180	1.38	4.49	65%		
<b>Potential Emissions (Worst Case)</b>											<b>3.49</b>	<b>83.78</b>	<b>15.29</b>	<b>55.45</b>				
<b>Controlled Potential Emissions</b>																		
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
											VOC	PM						
<b>Total Controlled Potential Emissions:</b>											0.00%	97.00%	<b>3.49</b>	<b>83.78</b>	<b>15.29</b>	<b>1.66</b>		

Note: There are no emissions of Hazardous Air Pollutants (HAPs) from the above listed coatings.  
 Note: There are no VOC or HAP-containing cleanup solvents used in the coating operations.

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Sum of worst case coatings in each booth

**Coatings As Supplied and As Applied**

See next page for As Applied calculations for the Line 3 dip tank.  
 The coatings for the Line 4 dip tanks are each reduced using 2.5 gallons water to 10 gallons of coating with no other additives. Thinning with just water does not change the pounds VOC per gallon less water, and the Line 4 coating usage was reported on an As Supplied basis. Therefore, no As Applied calculations were done for the Line 4 dip tank coatings.  
 All Spray Booth coatings are used As Supplied.

**Appendix A: Emissions Calculations**  
**Surface Coating - Paint, as supplied / applied**

**Company Name:** Stanrail, a division of Roll Form Group (U.S.) Inc.  
**Address City IN Zip:** 1225 Martin Luther King Drive, Gary, Indiana 46402  
**Permit Number:** M089-32000-00406  
**Pit ID:** 089-00406  
**Reviewer:** Sarah Street  
**Date:** 6/12/2012

	Coating 304R3 (as supplied)	Water	T-39 Waterborne Reducer	505-13 Waterborne Additive	Coating AS APPLIED
Paint/thinner mix (gallons each)	55.25	53.00	2.00	0.25	110.50
<b>Mix ratio, %</b>	<b>50.00%</b>	<b>47.96%</b>	<b>1.81%</b>	<b>0.23%</b>	<b>100.00%</b>
Density	10.00	8.33	7.25	7.39	9.14
Weight % Volatile (incl. Water)	59.28%	100%	100%	100%	79.64%
Weight % Water	45.22%	100%	0%	0%	70.57%
Weight % Organic Volatile	14.06%	0%	100%	100%	9.07%
Volume % Water	52.71%	100%	0%	0%	74.32%
Volume % Solids	27.95%	0%	0%	0%	13.98%

**Methodology**

Coating information supplied by Carbit Paint company.

Mix ratio information supplied by Stanrail Corporation.

Water mix is made by blending 53 gallons of water with 2 gallons of T-39 Reducer and 1 quart of 505-13 Additive.

Density of Coating as applied =  $[(10)(0.5) + (8.33)(0.4796) + (7.25)(0.0181) + (7.39)(0.0023)] = 9.143$  lbs/gal

Weight % Volatile as applied =  $[(59.28)(0.5) + (100)(0.4796) + (100)(0.0181) + (100)(0.0023)] = 79.64\%$

Weight % Water as applied =  $[(45.22)(0.5) + (100)(0.4796) + (0)(0.0181) + (0)(0.0023)] = 70.57\%$

Weight % Organics as applied =  $[(14.06)(0.5) + (0)(0.4796) + (100)(0.0181) + (100)(0.0023)] = 9.07\%$

Volume % Water as applied =  $[(52.71)(0.5) + (100)(0.4796) + (0)(0.0181) + (0)(0.0023)] = 74.315\%$

Volume % Solids as applied =  $[(27.95)(0.5) + (0)(0.4796) + (0)(0.0181) + (0)(0.0023)] = 13.975\%$

**Appendix A: Welding and Thermal Cutting**

**Company Name:** Stanrail, a division of Roll Form Group (U.S.) Inc.  
**Address City IN Zip:** 1225 Martin Luther King Drive, Gary, Indiana 46402  
**Permit Number:** M089-32000-00406  
**Pit ID:** 089-00406  
**Reviewer:** Sarah Street  
**Date:** 6/12/2012

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Line 3 Welding Station: Metal Inert Gas (MIG) (carbon steel)	2	5		0.0055	0.0005	0.0000	0.0000	0.0550	0.0050	0.0000	0.0000	0.005
Line 4 Welding Station: Metal Inert Gas (MIG) (carbon steel)	1	12		0.0055	0.0005	0.0000	0.0000	0.0660	0.0060	0.0000	0.0000	0.006
Metal Inert Gas (MIG) (carbon steel)	33	5		0.0055	0.0005	0.0000	0.0000	0.9075	0.0825	0.0000	0.0000	0.083
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick) <sup>#</sup>				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Burning Table: Oxyacetylene	6	2.5	20	0.1622	0.0005	0.0001	0.0003	2.920	0.000	0.000	0.000	0.000
Burning Table: Plasma**	2	0.375	150	0.0039				0.070	0.000	0.000	0.000	0.000
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								4.02	0.09	0.00	0.00	0.09
Potential Emissions lbs/day								96.44	2.25	0.00	0.00	2.25
Potential Emissions tons/year								17.60	0.411	0.000	0.000	0.411

**METHODOLGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted).

Therefore, the emission factor for plasma cutting is for 8 mm thick r

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

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

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

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

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

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

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Stanrail, a division of Roll Form Group (U.S.) Inc.  
Address City IN Zip: 1225 Martin Luther King Drive, Gary, Indiana 46402  
Permit Number: M089-32000-00406  
Plt ID: 089-00406  
Reviewer: Sarah Street  
Date: 6/12/2012**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
12.0	1020	103.1

Heat Input Capacity includes:	Total
One (1) water heater for Line 6	1.00
One (1) dry off oven for Line 6	1.00
One (1) curing oven for Line 6	1.00
Forty five (45) space heaters with each rated at 0.20 MMBtu/	9.00

45 space heaters, each at 0.20 MMBtu/hr

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.10	0.39	0.39	0.03	5.15	0.28	4.33

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
PM2.5 emission factor is filterable and condensable PM2.5 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.082E-04	6.184E-05	3.865E-03	9.275E-02	1.752E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.576E-05	5.668E-05	7.214E-05	1.958E-05	1.082E-04

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	6,184	0.1	0.1
Summed Potential Emissions in tons/yr	6,184		
CO2e Total in tons/yr	6,221		

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64  
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



# 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](http://www.idem.IN.gov)

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

**TO:** Thaddeshus Smith  
Stanrail, a division of Roll Form Group (U.S.) Inc  
1225 Martin Luther King Dr.  
Gary, IN 46402

**DATE:** August 13, 2012

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

**SUBJECT:** Final Decision  
MSOP  
089-32000-00406

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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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[www.idem.IN.gov](http://www.idem.IN.gov)

August 13, 2012

TO: Lake County Public Library

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

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

**Applicant Name: Stanrail a division of Roll Form Group US Inc.**  
**Permit Number: 089-32000-00406**

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 8/13/2012 Stanrail, a division of Roll Form Group (U.S.) Inc 089-32000-00406 (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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Thaddeshus Smith Stanrail, a division of Roll Form Group (U.S.) Inc 1225 Martin Luther King Dr. Gary IN 46402 (Source CAATS)										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
4		Gary Mayors Office 401 Broadway # 203 Gary IN 46402 (Local Official)										
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		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
8		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
9		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
11		Schneider Public Library 2400 Parish Street Schneider IN 46367 (Library)										
12		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
13		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
14		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
15		Barbara G. Perez 506 Lilac 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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Robert 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
2		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
3		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
4		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
5		Peter Julovich Gary Dept. of Environmental Affairs 839 Broadway N206 Gary IN 46402 (Local Official)										
6		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
7		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)										
8		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
9												
10												
11												
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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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