INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To:	Interested Parties
Date:	September 26, 2014
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	Amsted Rail Company, Inc.
Permit Level:	Title V Significant Source Modification
Permit Number:	089-34712-00204
Source Location:	4831 Hohman Avenue, Hammond, Indiana
Type of Action Taken:	Modification at an existing source

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 matter referenced above.

The final decision is available on the IDEM website at: http://www.in.gov/apps/idem/caats/
To view the document, select Search option 3, then enter permit 34712.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

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.

(continues on next page)

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.

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September 26, 2014

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

Re: 089-34712-00204
Significant Source Modification

Dear Mr. Ribbing:

Amsted Rail Company, Inc. was issued Part 70 Operating Permit Renewal No. TT089-33178-00204 on July 21, 2014 for a stationary steel coil spring manufacturing plant located at 4831 Hohman Avenue, Hammond, Indiana 46327. An application to modify the source was received on July 15, 2014. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) XL Line Coil Spring Manufacturing Process, with a maximum capacity of 15.65 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2838A, approved in 2014 for construction, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, approved in 2014 for construction, with a maximum design capacity of 10 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(b) One (1) Shot Peener, identified as 3-1827, approved in 2014 for construction, with a maximum capacity of 15.65 tons of steel parts per hour, using a baghouse, identified as 3-1827A, for particulate matter control, and venting inside.

(c) One (1) natural gas-fired Small Line Slot Furnace, identified as 2-5006A, approved in 2014 for construction, with a maximum design capacity of 4 MMBtu/hr heat input, venting inside and no control.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

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

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

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

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

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

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

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Mehul Sura of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Mehul Sura or extension your extension or dial (317) 233-6868.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

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

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Commissioner

Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

Amsted Rail Company, Inc.
4831 Hohman Avenue
Hammond, Indiana 46327

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 089-34712-00204	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2014

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the 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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

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

Source Address:	4831 Hohman Avenue, Hammond, Indiana 46327
General Source Phone Number:	(618) 225-6419
SIC Code:	3493 (Steel Springs, Except Wire)
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, Emission Offset Rules Minor Source under PSD 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 [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) Two (2) Natural gas-fired furnaces, equipped with no control and venting inside, which include the following units:

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)	Year Constructed/Modified
2-5027	Large Line Bar Furnace	20.5	1938
2-5075	XL Line Bar Furnace	22.0	1956/2014

(b) Ten (10) Coil Spring Grinders, which include the following:

Unit ID	Unit Description	Maximum Design Rate (tons springs ground per hour)	Year Constructed
3-0244	#1 Mattson (Large) Grinder	2.15	1989
3-0247	Torrington Ferris Wheel Grinder	0.91	1942
3-0249	Gardner Paddle Wheel Grinder	0.15	1947
3-0385	#1 BESLY Ferris Wheel Grinder	1.55	1978
3-0386	#2 BESLY Ferris Wheel Grinder	1.11	1978
3-0389	Gardner Tub Grinder	0.55	1980
3-0393	#2 Mattson (Small) Grinder	2.15	1989
3-0394	BESLY Swing Grinder	0.35	1998

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

(c) Four (4) Coil Spring Manufacturing Process Lines, which include the following:

(1) Small Line Coil Spring Manufacturing Process, with a maximum capacity of 1.5 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2821, constructed in 1973, using an oil smoke filter, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5163, constructed in 1973, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(2) XL Line Coil Spring Manufacturing Process, with a maximum capacity of 15.65 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2838A, approved in 2014 for construction, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, approved in 2014 for construction, with a maximum design capacity of 10 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(3) Large Line Coil Spring Manufacturing Process, with a maximum capacity of 5 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2845, constructed in 1959, using an oil smoke filter, identified as 3-3036, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5164, constructed in 1959, with a maximum design capacity of 9.8 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(4) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes:

(i) One (1) oil quench tank, identified as 3-4000, constructed in 2012, using an oil smoke filter, identified as 3-4001, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097A, constructed in 2012, with a maximum design capacity of 5.0 MMBtu/hr heat input, used to stress relieve the newly coiled springs after the quench operation, no control.

(d) Two (2) Paint Spray Booths, which include the following:

(1) Paint Spray Booth, identified as 3-2714, constructed in 1980, with a maximum capacity of 0.102 gallons of coating per hour, coating steel coil springs, using High Volume Low Pressure (HVLP) Spray Application method and dry filters -

double wall as PM control, and exhausting to Stack 30.

(2) Paint Spray Booth, identified as 3-2715, constructed in 1989, with a maximum capacity of 0.061 gallons of coating per hour, coating steel coil springs, using High Volume Low Pressure (HVLP) Spray Application method and using dry filters - double wall as PM control, and exhausting to Stack 31.

(e) Ten (10) Coil Spring Coating Dip Tanks, for application of rust preventative coatings to steel coil springs, no control, venting inside and include the following:

Unit ID	Coating	Coating Usage (gal/hr)	Year Constructed
3-2813	Water-based Clear Coating	6.1	Prior to 1994
3-2865	Water-based Clear Coating		Prior to 1994
3-2865A	Water-based Clear Coating		Prior to 1994
3-2867	Water-based Clear Coating		2011
3-2870	Water-based Clear Coating		Prior to 1994
3-2869	Solvent-based or Water-based Clear Coating	4.5	Prior to 1994
3-2872	Solvent-based or Water-based Clear Coating		Prior to 1994
3-2873	Solvent-based or Water-based Clear Coating		Prior to 1994
3-2874A	Water-based Clear Coating	4.5	2011
3-2874B	Water-based Clear Coating	4.5	2012

(f) Seven (7) Shot Peeners, which include the following units:

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

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

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

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

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

(6) One (1) Shot Peener, identified as 3-1826, constructed in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826A, for particulate matter control, and venting inside.

(7) One (1) Shot Peener, identified as 3-1827, approved in 2014 for construction, with a maximum capacity of 15.65 tons of steel parts per hour, using a baghouse, identified as 3-1827A, for particulate matter control, and venting inside.

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

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

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

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)
2-5006	Small Line Slot Furnace	4.0
2-5006A	Small Line Slot Furnace	4.0
2-5007	Small Line Slot Furnace	1.5
2-5014	XL Line Slot Furnace	4.0
2-5015	XL Line Slot Furnace	4.0
2-5036	Large Line Slot Furnace	2.5
2-5085	Small Line Bar Furnace	8.0
2-5201	Line 4 Slot Furnace	4.0
2-5202	Line 4 Slot Furnace	1.25
2-5203A	Line 4 Bar Furnace	6.5

(b) One (1) 130-hp emergency fire pump diesel engine, constructed in 1947.

Under 40 CFR 63, Subpart ZZZZ, the emergency fire pump engine considered existing RICE.

(c) Two (2) Cold Cleaner Degreasers, each with maximum capacity of 0.06 gallons per hour, with solvent not remotely stored, not heated, or agitated and solvent spray is not used.

(d) Paved and unpaved roads and parking lots with public access.

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

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

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

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

Under 40 CFR 63, Subpart CCCCCC, it is considered an existing affected source.

(i) A petroleum fuel or other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.

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

(k) Routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines and purging of vessels.

(l) Two (2) quench oil heaters, constructed in 2012, identified as 2-5204A and 2-5204B, and rated at 2.5 MMBtu/hr, each.

(m) Production related activities, including the following: Machining where an aqueous cutting coolant continuously floods the machining interface.

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, 089-33178-00204, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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 [326 IAC 2-7-5(5)]

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

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

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

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

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

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

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

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

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

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

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

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553**.**

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

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

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

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to 089-33178-00204 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

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

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

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

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

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(3) Any change in emissions; and

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

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

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

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

(c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.

(d) Material processing facilities shall include the following:

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

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

(3) The PM10 stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

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

(f) Material transfer limits shall be as follows:

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

(2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the

operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Continuous Compliance Plan [326 IAC 6.8-8-1] [326 IAC 6.8-8-8]

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

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

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

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

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in

accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

(II)

(a) CAM *Response to excursions or exceedances.*

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

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

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

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

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

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

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

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

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

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

(h) *CAM recordkeeping requirements.*

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

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks,

or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

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

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.

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

Records of required monitoring information include the following, where applicable:

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

(e) The requirements specified in (c) and (d) above as it relates to the PSD regulations would only apply if the source becomes a major source under the PSD regulations found at 326 IAC 2-2.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2][326 IAC 2-3] [40 CFR 64][326 IAC 3-8]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

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

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

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

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

and reduced the likelihood of similar levels of excursions or exceedances occurring.

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

(b) The address for report submittal is:

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

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

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

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

(h) The requirements specified in (e) and (f) above as it relates to the PSD regulations would only apply if the source becomes a major source under the PSD regulations found at 326 IAC 2-2.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Coil Spring Grinders

(a) Two (2) Natural gas-fired furnaces, equipped with no control and venting inside, which include the following units:

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)	Year Constructed/Modified
2-5027	Large Line Bar Furnace	20.5	1938
2-5075	XL Line Bar Furnace	22.0	1956/2014

(b) Ten (10) Coil Spring Grinders, which include the following:

Unit ID	Unit Description	Maximum Design Rate (tons springs ground per hour)	Year Constructed
3-0244	#1 Mattson (Large) Grinder	2.15	1989
3-0247	Torrington Ferris Wheel Grinder	0.91	1942
3-0249	Gardner Paddle Wheel Grinder	0.15	1947
3-0385	#1 BESLY Ferris Wheel Grinder	1.55	1978
3-0386	#2 BESLY Ferris Wheel Grinder	1.11	1978
3-0389	Gardner Tub Grinder	0.55	1980
3-0393	#2 Mattson (Small) Grinder	2.15	1989
3-0394	BESLY Swing Grinder	0.35	1998

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

Insignificant Activities

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

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)
2-5006	Small Line Slot Furnace	4.0
2-5006A	Small Line Slot Furnace	4.0
2-5007	Small Line Slot Furnace	1.5
2-5014	XL Line Slot Furnace	4.0
2-5015	XL Line Slot Furnace	4.0
2-5036	Large Line Slot Furnace	2.5
2-5085	Small Line Bar Furnace	8.0
2-5201	Line 4 Slot Furnace	4.0
2-5202	Line 4 Slot Furnace	1.25
2-5203A	Line 4 Bar Furnace	6.5

(l) Two (2) quench oil heaters, constructed in 2012, identified as 2-5204A and 2-5204B, and rated at 2.5 MMBtu/hr, each.

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

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

D.1.1 Particulate Matter Limitations for Lake County [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2, the PM emissions after control from the quench oil heaters (2-5204A and 2-5204B) shall not exceed 0.03 grains/dscf.

D.1.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-4]

(a) Pursuant to 326 IAC 6.8-2-4(a) (Lake County PM10 Emission Requirements), PM10 emissions after control from the facilities listed below shall not exceed the limit as specified below.

Process served by Stack 3	Unit ID	PM10 Emission Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	2.085
Torrington Ferris Wheel Grinder	3-0247	
Gardner Paddle Wheel Grinder	3-0249	
#1 BESLY Ferris Wheel Grinder	3-0385	
#2 BESLY Ferris Wheel Grinder	3-0386	
Gardner Tub Grinder	3-0389	
#2 Mattison (Small) Grinder	3-0393	
BESLY Swing Grinder	3-0394	

(b) Pursuant to 326 IAC 6.8-2-4(b) (Lake County: PM10 Emission Requirements), the furnaces listed in this section shall fire natural gas only.

D.1.3 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
#1 Mattison (Large) Grinder	3-0244	0.99	2.085	0.99
Torrington Ferris Wheel Grinder	3-0247			
Gardner Paddle Wheel Grinder	3-0249			
#1 Besley Ferris Wheel Grinder	3-0385			
#2 Besley Ferris Wheel Grinder	3-0386			
Gardner Tub Grinder	3-0389			
#2 Mattison (Small) Grinder	3-0393			
Besley Swing Grinder	3-0394			

Compliance with these limits, combined with the limits in Conditions D.2.3, and D.4.3, and the unrestricted potential to emit of PM, PM10 and PM2.5 from all other equipment at this source will limit the potential to emit of PM, PM10 and PM2.5 from the entire source to less than two hundred fifty (250) tons per year, each, and render 326 IAC 2-2 not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan (PMP) is required for the facilities listed below and its control device (baghouse 3-3037). Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Unit ID	Unit Description
3-0244	#1 Mattson (Large) Grinder
3-0247	Torrington Ferris Wheel Grinder
3-0249	Gardner Paddle Wheel Grinder
3-0385	#1 BESLY Ferris Wheel Grinder
3-0386	#2 BESLY Ferris Wheel Grinder
3-0389	Gardner Tub Grinder
3-0393	#2 Mattson (Small) Grinder
3-0394	BESLY Swing Grinder

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

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.2(a) and D.1.3, the baghouse (3-3037) for PM, PM10, and PM2.5 control shall be in operation and control emissions at all times when one or more of the associated grinders to this baghouse is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification. If the failed compartment can be isolated and testing has confirmed that compliance can be achieved with one compartment down, this notification is not required.

D.1.6 Broken or Failed Bag Detection – Single Compartment Baghouse

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

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

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

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.1.2(a), the Permittee shall perform PM10 testing of the baghouse (3-3037) controlling the grinders listed below no later than 5 years after the most recent testing.

Emission Unit	ID
#1 Mattison (Large) Grinder	3-0244
Torrington Ferris Wheel Grinder	3-0247
Gardner Paddle Wheel Grinder	3-0249
#1 BESLY Ferris Wheel Grinder	3-0385
#2 BESLY Ferris Wheel Grinder	3-0386
Gardner Tub Grinder	3-0389
#2 Mattison (Small) Grinder	3-0393
BESLY Swing Grinder	3-0394

This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM10 includes filterable and condensable PM.

(b) In order to demonstrate compliance with Condition D.1.3, the Permittee shall perform PM and PM2.5 testing of the baghouse (3-3037) controlling the grinders listed below no later than 5 years after the most recent testing.

Emission Unit	ID
#1 Mattison (Large) Grinder	3-0244
Torrington Ferris Wheel Grinder	3-0247
Gardner Paddle Wheel Grinder	3-0249
#1 BESLY Ferris Wheel Grinder	3-0385
#2 BESLY Ferris Wheel Grinder	3-0386
Gardner Tub Grinder	3-0389
#2 Mattison (Small) Grinder	3-0393
BESLY Swing Grinder	3-0394

This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM2.5 includes filterable and condensable PM.

(c) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

The Permittee has an option to comply with the testing requirements specified in paragraphs (a) and (b) above, concurrently through one compliance test for the baghouse (3-3037).

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

D.1.8 Visible Emissions Notations [40 CFR 64]

(a) Visible emission notations of the baghouse (3-3037) stack exhaust shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

The above monitoring conditions also are required under 40 CFR 64 for Grinders3-0244, 3-0385 and 3-0393 (for PM).

D.1.9 Parametric Monitoring [40 CFR 64]

(a) The Permittee shall record the pressure drop across the baghouse (3-3037) used in conjunction with the coil spring grinders at least once per day when one or more of the associated grinders to this baghouse is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.

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

The above monitoring conditions also are required under 40 CFR 64 for Grinder 3-0244, 3-0385 and 3-0393 (for PM).

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

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations of the baghouse (3-3037) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.1.9(a), the Permittee shall maintain a daily record of the pressure drop reading across the baghouse (3-3037). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.1.9(b), the Permittee shall maintain records of calibrations of the instrument used for determining the pressure drop across the baghouse (3-3037).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Coil Spring Manufacturing Process Lines

(c) Four (4) Coil Spring Manufacturing Process Lines, which include the following:

(1) Small Line Coil Spring Manufacturing Process, with a maximum capacity of 1.5 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2821, constructed in 1973, using an oil smoke filter, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5163, constructed in 1973, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(2) XL Line Coil Spring Manufacturing Process, with a maximum capacity of 15.65 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2838A, approved in 2014 for construction, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, approved in 2014 for construction, with a maximum design capacity of 10 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(3) Large Line Coil Spring Manufacturing Process, with a maximum capacity of 5 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2845, constructed in 1959, using an oil smoke filter, identified as 3-3036, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5164, constructed in 1959, with a maximum design capacity of 9.8 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(4) Line 4 Coil Spring Manufacturing Process, with a maximum capacity of 5.25 tons of coil springs manufactured per hour, includes:

(i) One (1) oil quench tank, identified as 3-4000, constructed in 2012, using an oil smoke filter, identified as 3-4001, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097A, constructed in 2012, with a maximum design capacity of 5.0 MMBtu/hr heat input, used to stress relieve the newly coiled springs after the quench operation, no control.

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

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

D.2.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2]

(a) Pursuant to 326 IAC 6.8-2-4(a) (Lake County: PM10 Emission Requirements), PM10 emissions after control from the facilities listed below shall not exceed the limits as specified below.

Emission Unit	ID	Emission Limit (lb/hr)
Small Line Coil Spring Manufacturing Process	3-2821	1.05
Large Line Coil Spring Manufacturing Process	3-2845	1.75

(b) Pursuant to 326 IAC 6.8-2-4(b), the Small Line draw furnace (2-5163), XL Line draw furnace (2-5097), Large Line draw furnace (2-5164) and Line 4 draw furnace (2-5097A) shall fire natural gas only.

D.2.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a), the PM emissions after control from the oil quench tank (3-2838A) of XL Line Coil Spring Manufacturing Process and oil quench tank (3-4000) of Line 4 Coil Spring Manufacturing Process shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

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

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Small Line Quench Tank	3-2821	2.97	1.05	1.05
XL Line Quench Tank	3-2838A	8.91	8.91	8.91
Large Line Quench Tank	3-2845	2.97	1.75	1.75
Line 4 Quench Tank	3-4000	3.09	3.09	3.09

Compliance with these limits, combined with the limits in Conditions D.1.3 and D.4.3, and the unrestricted potential to emit of PM, PM10 and PM2.5 from all other equipment at this source will limit the potential to emit of PM, PM10 and PM2.5 from the entire source to less than two hundred fifty (250) tons per year, each, and render 326 IAC 2-2 not applicable.

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

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

Emission Unit	ID
Small Line Quench Tank	3-2821
XL Line Quench Tank	3-2838A
Large Line Quench Tank	3-2845
Line 4 Quench Tank	3-4000

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

D.2.5 Particulate Control

(a) In order to ensure compliance with Conditions D.2.1(a), and D.2.3, the oil smoke filter equipped on the Small Line Coil Spring Manufacturing Process for PM, PM10, PM2.5 control shall be in operation and control emissions at all times when the Small Line Coil Spring Manufacturing Process is in operation.

(b) In order to ensure compliance with Conditions D.2.1(b), D.2.2 and D.2.3, the oil smoke filter equipped on the XL Line Coil Spring Manufacturing Process for PM, PM10, PM2.5 control shall be in operation and control emissions at all times when the XL Line Coil Spring Manufacturing Process is in operation.

(c) In order to ensure compliance with Conditions D.2.1(a) and D.2.3, the oil smoke filter equipped on the Large Line Coil Spring Manufacturing Process for PM, PM10, and PM2.5 control shall be in operation and control emissions at all times when the Large Line Coil Spring Manufacturing Process is in operation.

(d) In order to ensure compliance with Conditions D.2.2 and D.2.3, the oil smoke filter equipped on the Line 4 Coil Spring Manufacturing Process for PM, PM10 and PM2.5 control shall be in operation and control emissions at all times the Line 4 Coil Spring Manufacturing Process is in operation.

D.2.6 Testing Requirements

(a) In order to demonstrate the compliance status with Condition D.2.1(a), the Permittee shall perform PM10 testing for the units listed below no later than 5 years after the most recent testing.

Emission Unit	ID
Small Line Coil Spring Manufacturing Process	3-2821
Large Line Coil Spring Manufacturing Process	3-2845

This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM10 includes filterable and condensable PM.

(b) In order to demonstrate the compliance status with Condition D.2.2, the Permittee shall perform PM testing for the oil quench tank (3-4000) of Line 4 Coil Spring Manufacturing Process, no later than 5 years after the most recent testing. This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(c) In order to demonstrate the compliance status with Condition D.2.3, the Permittee shall perform PM, PM10, and PM2.5 testing for the units listed below no later than 5 years after the most recent testing.

Emission Unit	ID
Small Line Quench Tank	3-2821
Line 4 Quench Tank	3-4000

This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM10 and PM2.5 includes filterable and condensable PM.

(d) In order to demonstrate the compliance status with Condition D.2.3, the Permittee shall perform PM, PM10, and PM2.5 testing for the unit listed below no later than no later than one hundred eighty (180) days after the issuance of renewal T089-33178-00204.

Emission Unit	ID
Large Line Quench Tank	3-2845

This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM10 and PM2.5 includes filterable and condensable PM.

(e) In order to demonstrate the compliance status with Conditions D.2.2 and D.2.3, the Permittee shall perform PM, PM10, and PM2.5 testing for XL line quench tank (3-2838A) no later than one hundred eighty (180) days after the initial startup of the XL line quench tank (3-2838A). This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM10 and PM2.5 includes filterable and condensable PM.

(f) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

The Permittee has an option to comply with the testing requirements specified in paragraphs (a) through (f) above, concurrently through one compliance test for PM, PM10 and PM2.5 for each emission unit.

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

D.2.7 Oil Smoke Filter Inspections

An inspection shall be performed each calendar quarter of the oil smoke filters equiped on the Small line quench tank (3-2821) and oil smoke filters (3-3027A, 3-3036 and 3-4001) controlling it's associated quench tanks. All defective oil smoke filters shall be replaced.

D.2.8 Broken or Failed Oil Smoke Filter Detection

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

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

Oil Smoke Filter failure can be indicated by a significant drop in the oil smoke filter's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Spray Booths

(d) Two (2) Paint Spray Booths, which include the following:

(1) Paint Spray Booth, identified as 3-2714, constructed in 1980, with a maximum capacity of 0.102 gallons of coating per hour, coating steel coil springs, using High Volume Low Pressure (HVLP) Spray Application method and dry filters - double wall as PM control, and exhausting to Stack 30.

(2) Paint Spray Booth, identified as 3-2715, constructed in 1989, with a maximum capacity of 0.061 gallons of coating per hour, coating steel coil springs, using High Volume Low Pressure (HVLP) Spray Application method and using dry filters - double wall as PM control, and exhausting to Stack 31.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and eight-tenths (2.8) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

(b) Pursuant to 326 IAC 8-2-9(d)(2), one (1) or a combination of the following equipment shall be used for coating application:

(A) Electrostatic equipment.
(B) High volume low-pressure (HVLP) spray equipment.
(C) Flow coating.
(D) Roller coating.
(E) Dip coating, including electrodeposition.
(F) Airless spray.
(G) Air-assisted airless spray.
(H) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

(c) Pursuant to 326 IAC 8-2-9(f), the work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) 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.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) 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.3.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(h), the Permittee shall install and operate particulate control device on Paint Spray Booths 3-2714 and 3-2715, if a coating application rate at these booths increases to greater than five (5) gallons per day.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan (PMP) is required for the Paint Spray Booths 3-2714 and 3-2715, and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2]

(a) For compliant coating and daily volume weighted average options
Compliance with the VOC content and usage limitations contained in Condition D.3.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) For daily volume weighted average option
Compliance with the VOC content limit in Condition D.3.1(a), when using non compliant coating, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis.

This volume weighted average shall be determined by the following equation:

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

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

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

D.3.5 Record Keeping Requirements

(a) For compliant coating option
To document compliance with Condition D.3.1(a), the Permittee shall maintain records in accordance with (1) through (4) below when compliant coating is used. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.1(a).

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on daily 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 daily cleanup solvent usage; and

(4) The total VOC usage for each day.

(b) For daily volume weighted average option
To document compliance with Condition D.3.1(a), the Permittee shall maintain records in accordance with (1) through (5) below when Daily volume weighted average option is used. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.1(a).

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on daily 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 volume weighted average VOC content of the coatings used for each day;

(4) The daily cleanup solvent usage; and

(5) The total VOC usage for each day.

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Dip Tanks

(e) Ten (10) Coil Spring Coating Dip Tanks, for application of rust preventative coatings to steel coil springs, no control, venting inside and include the following:

Unit ID	Coating	Coating Usage (gal/hr)	Year Constructed
3-2813	Water-based Clear Coating	6.1	Prior to 1994
3-2865	Water-based Clear Coating		Prior to 1994
3-2865A	Water-based Clear Coating		Prior to 1994
3-2867	Water-based Clear Coating		2011
3-2870	Water-based Clear Coating		Prior to 1994
3-2869	Solvent-based or Water-based Clear Coating	4.5	Prior to 1994
3-2872	Solvent-based or Water-based Clear Coating		Prior to 1994
3-2873	Solvent-based or Water-based Clear Coating		Prior to 1994
3-2874A	Water-based Clear Coating	4.5	2011
3-2874B	Water-based Clear Coating	4.5	2012

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

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

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

(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and eight-tenths (2.8) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

(b) Pursuant to 326 IAC 8-2-9(d)(2), one (1) or a combination of the following equipment shall be used for coating application:

(A) Electrostatic equipment.
(B) High volume low-pressure (HVLP) spray equipment.
(C) Flow coating.
(D) Roller coating.
(E) Dip coating, including electrodeposition.
(F) Airless spray.
(G) Air-assisted airless spray.
(H) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

(c) Pursuant to 326 IAC 8-2-9(f), the work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) 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.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) 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.

Compliance Determination Requirements

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2]

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

(b) For daily volume weighted average option
Compliance with the VOC content limit in Condition D.4.1(a) , when using non compliant coating, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

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

D.4.3 Record Keeping Requirements

(a) When compliant coating option is used
To document compliance with Condition D.4.1(a), the Permittee shall maintain records in accordance with (1) through (4) below when compliant coating is used. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.4.1(a).

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on daily 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 daily cleanup solvent usage; and

(4) The total VOC usage for each day.

(b) When daily volume weighted average option is used
To document compliance with Condition D.4.1(a), the Permittee shall maintain records in accordance with (1) through (5) below when Daily volume weighted average option is used. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.4.1(a).

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on daily 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 volume weighted average VOC content of the coatings used for each day;

(4) The daily cleanup solvent usage; and

(5) The total VOC usage for each day.

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

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Shot Peeners

(f) Seven (7) Shot Peeners, which include the following units:

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

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

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

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

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

(6) One (1) Shot Peener, identified as 3-1826, constructed in 2012, with a maximum capacity of 5.25 tons of steel parts per hour, using a baghouse, identified as 3-1826A, for particulate matter control, and venting inside.

(7) One (1) Shot Peener, identified as 3-1827, approved in 2014 for construction, with a maximum capacity of 15.65 tons of steel parts per hour, using a baghouse, identified as 3-1827A, for particulate matter control, and venting inside.

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

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

D.5.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2]

Pursuant to 326 IAC 6.8-2-4(a) (Lake County: PM10 Emission Requirements), PM10 emissions after control from the facilities listed below shall not exceed the limits as specified below.

Facility	ID	PM10 Emission Limit (lb/ton)	PM10 Emission Limit (lb/hr)
Pangborn Shot Peener	3-1804	0.011	0.06
Wheelabrator Shot Peener	3-1821	0.016	0.06
Wheelabrator Shot Peener	3-1823	0.016	0.06

D.5.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the PM emissions after control from the facilities listed below shall not exceed the limits as specified below.

Emission Unit	ID	PM Emission Limit (grains/dscf)
Shot Peener	3-1824	0.03
	3-1825	0.03
	3-1826	0.03
	3-1827	0.03

D.5.3 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Pangborn ShotPeener	3-1804	0.99	0.06	0.06
Wheelabrator Shot Peener	3-1821	0.99	0.06	0.06
Wheelabrator Shot Peener	3-1823	0.99	0.06	0.06
Shot Peener	3-1824	0.99	0.99	0.99
Shot Peener	3-1825	0.99	0.99	0.99
Shot Peener	3-1826	1.03	1.03	1.03
Shot Peener	3-1827	3.09	3.09	3.09

Compliance with these limits combined with the limits in Conditions D.1.3 and D.2.3, and the unrestricted potential to emit of PM, PM10 and PM2.5 from all other equipment at this source will limit the potential to emit of PM, PM10 and PM2.5 from the entire source to less than two hundred fifty (250) tons per year, each, and render 326 IAC 2-2 not applicable.

D.5.4 Hazardous Air Pollutants [326 IAC 20] [40 CFR Part 63, Subpart MMMM]

In order to render the requirements of 40 CFR Part 63, Subpart MMMM not applicable, the Permittee shall comply with the following:

Emission Unit	ID	Single HAP (Mn) Limit (lb/hr)	Single HAP (Cr) Limit (lb/hr)	Combined HAPs Limit (lb/hr)
Pangborn ShotPeener	3-1804	0.033	0.030	0.063
Wheelabrator Shot Peener	3-1821	0.033	0.030	0.063
Wheelabrator Shot Peener	3-1823	0.033	0.030	0.063
Shot Peener	3-1824	0.033	0.030	0.063
Shot Peener	3-1825	0.033	0.030	0.063
Shot Peener	3-1826	0.033	0.030	0.063
Shot Peener	3-1827	0.102	0.093	0.195

Compliance with these limits, in conjunction with HAP emissions from other emission units at the source will limit source-wide single HAP and combined HAPs emissions to less than 10 and 25 tons per year, respectively, and render the requirements of 40 CFR Part 63, Subpart MMMM not applicable.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.5.6 Particulate Control [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]

(a) In order to comply with Conditions D.5.1, D.5.2, D.5.3 and D.5.4, the particulate and HAPs control devices equipped on the emission units listed in Conditions D.5.1, D.5.2, D.5.3 and D.5.4 shall be in operation and control emissions from its associated emission unit at all times that the associated emission unit is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification. If the failed compartment can be isolated and testing has confirmed that compliance can be achieved with one compartment down, this notification is not required.

D.5.7 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate the compliance status with Conditions D.5.1, D.5.2 and D.5.3, the Permittee shall perform PM, PM10, and PM2.5 testing on any two (2) of the Shot Peeners listed below no later than no later than five (5) years of the most recent testing performed on Shot Peener 3-1824.

Emission Unit	ID
Pangborn ShotPeener	3-1804
Wheelabrator Shot Peener	3-1821
Wheelabrator Shot Peener	3-1823
Shot Peener	3-1824
Shot Peener	3-1825
Shot Peener	3-1826

The testing shall be repeated every five (5) years on any two (2) of the Shot Peeners mentioned above such that the time period between tests on each unit does not exceed fifteen (15) years.

PM10 and PM2.5 includes filterable and condensable PM.

(b) In order to demonstrate the compliance status with Condition D.5.3, the Permittee shall perform PM, PM10, and PM2.5 testing on Shot Peener (3-1826) within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup of Shot Peener (3-1826).

PM10 and PM2.5 includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Conditions D.5.2 and D.5.3, the Permittee shall perform PM, PM10, and PM2.5 testing for the shot peener (3-1827) no later than one hundred eighty (180) days after the initial startup of the of shot peener (3-1827). This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

PM10 and PM2.5 includes filterable and condensable PM.

(d) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.5.8 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse (3-1827A) used in conjunction with the shot peener (3-1827), at least once per day when the shot peener (3-1827) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.5.9 Baghouse Inspections

An inspection shall be performed for each of the baghouse specified below controlling its associated shot peener. The inspection shall be performed each calendar quarter and all defective bags shall be replaced.

Baghouse ID	Associated Shot Peener ID
3-3017	3-1804
3-3022	3-1821
3-1823	3-1823
3-3024	3-1824
3-3025	3-1825
3-1826A	3-1826
3-1827A	3-1827

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

D.5.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.5.8, the Permittee shall maintain daily records of the pressure drop across the baghouse (3-1827A) controlling the shot peener (3-1827). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

(b) To document the compliance status with Condition D.5.9, the Permittee shall maintain records of the results of the inspections required under Condition D.5.9.

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

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Degreasers

Insignificant Activities

(c) Two (2) Cold Cleaner Degreasers, each with maximum capacity of 0.06 gallons per hour, with solvent not remotely stored, not heated, or agitated and solvent spray is not used.

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

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

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3]

(a) Pursuant to 326 IAC 8-3-2(a), Permittee shall comply with the following:

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.
(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
(5) Provide a permanent, conspicuous label that lists the operating requirements in items (3), (4), (6), and (7).
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-8(b), Permittee shall not shall operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(c) Pursuant to 326 IAC 8-3-8(c), Permittee shall maintain each of the following records for each solvent purchase:

(A) The name and address of the solvent supplier.
(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).
(C) The type of solvent purchased.
(D) The total volume of the solvent purchased.
(E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixtyeight (68) degrees Fahrenheit).

(d) Pursuant to 326 IAC 8-3-8(d), all the records specified in paragraph (c) above shall be retained on-site or accessible electronically from the site for the most recent three (3) year period, and reasonably accessible for an additional two (2) year period.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Gasoline Fuel Transfer Dispensing

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

Under 40 CFR 63, Subpart CCCCCC, it is considered an existing affected source.

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

E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

(a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart CCCCCC.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment B of this permit), for the gasoline fuel transfer dispensing operation, except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.

(1) 40 CFR 63.11110
(2) 40 CFR 63.11111
(3) 40 CFR 63.11112
(4) 40 CFR 63.11113(b)
(5) 40 CFR 63.11115
(6) 40 CFR 63.11116
(7) 40 CFR 63.11130
(8) 40 CFR 63.11132

SECTION E.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description: Emergency Fire Pump Engine

Insignificant Activities:

(b) One (1) 130-hp emergency fire pump diesel engine, constructed in 1947.

Under 40 CFR 63, Subpart ZZZZ, the emergency fire pump engine considered existing RICE.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the emergency fire pump engine, except when otherwise specified in 40 CFR Part 63 Subpart ZZZZ.

E.2.2 National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

Pursuant to CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as 'Attachment C'), which are incorporated by reference as 326 IAC 20-82 for the emergency fire pump engine:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(a) and (c)
(3) 40 CFR 63.6590(a)(1)
(4) 40 CFR 63.6595(a)(1)
(5) 40 CFR 63.6603(a)
(6) 40 CFR 63.6604
(7) 40 CFR 63.6605
(8) 40 CFR 63.6625(e)(3) and (f)
(9) 40 CFR 63.6645(a)(5)
(10) 40 CFR 63.6660
(11) 40 CFR 63.6665
(12) 40 CFR 63.6670
(13) 40 CFR 63.6675

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
Part 70 Permit No.: 089-33178-00204

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

Please check what document is being certified:

□ Annual Compliance Certification Letter

□ Test Result (specify)

□ Report (specify)

□ Notification (specify)

□ Affidavit (specify)

□ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
Part 70 Permit No.: 089-33178-00204

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

□ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Amsted Rail Company, Inc.
Source Address: 4831 Hohman Avenue, Hammond, Indiana 46327
Part 70 Permit No.: 089-33178-00204

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Amsted Rail Company, Inc.
Source Location:	4831 Hohman Avenue, Hammond, Indiana 46327
County:	Lake
SIC Code:	3493 (Steel Springs, Except Wire)
Operation Permit No.:	T089-33178-00204
Operation Permit Issuance Date:	July 22, 2014
Significant Source Modification No.:	089-34712-00204
Significant Permit Modification No.:	089-34725-00204
Permit Reviewer:	Mehul Sura

On August 23, 2014, the Office of Air Quality (OAQ) had a notice published in The Post Tribune, Merrillville, Indiana and The Times, Munster, Indiana, Indiana, stating that Amsted Rail Company, Inc. had applied for significant source and significant permit modification to construct and operate, respectively, new XL line oil quench tank (3-2838A), XL line draw furnace (2-5097) and shot peener (3-1827). The notice also stated that the OAQ proposed to issue significant source and significant permit modification 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

On September 19, 2014, Amsted Rail Company, Inc. submitted comments to IDEM, OAQ on the draft significant source and significant permit modification.

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. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Item (f) in the description box in Section D.5 states that there are six (6) shot peeners. There are actually seven (7) shot peeners and the description should be changed accordingly.

Response 1:

IDEM agrees with the recommended change. The permit has been revised as requested above.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Shot Peeners

(f) **Seven (7)**~~Six (6)~~ Shot Peeners, which include the following units:

. . .

. . .

Comment 2:

Condition D.5.4
We understand that with the addition of the new shot peener (3-1827), the uncontrolled HAP emissions are greater than the major source thresholds for HAPs and would therefore need to be limited in order to remain an Area Source of HAPs. IDEM included Condition D.5.4 to limit HAPs emissions but the wording of the condition states that the HAPs emissions limits are included specifically to render the requirements of NESHAP, Subpart MMMM not applicable. We request that references to NESHAP, Subpart MMMM be removed from the permit. Amsted Rail Company, Inc. is proposing to accept limits to remain an Area Source of HAPs to avoid becoming a Major Source of HAPs and potentially subject to other MACT standards, not just Subpart MMMM.

We request that Condition D.5.4 be revised to remove references to Subpart MMMM as follows:

D.5.4 Hazardous Air Pollutants [326 IAC 20] [40 CFR Part 63, Subpart MMMM]

. . .

Compliance with these limits, in conjunction with HAP emissions from other emission units at the source will limit source-wide single HAP and combined HAPs emissions to less than 10 and 25 tons per ~~year~~ **twelve (12) consecutive month period** respectively~~, and render the requirements of 40 CFR Part 63, Subpart MMMM not applicable~~.

Page 12 of 21 of the Technical Support Document
The last paragraph of part (a) in the Compliance Monitoring Requirements section states that the monitoring conditions are necessary to render the requirements of NESHAP, Subpart MMMM not applicable. As described above, we request that specific references to Subpart MMMM be removed from the permit and TSD. We understand that IDEM has established the monitoring requirements for compliance assurance but it would be more accurate to state that the monitoring is required in order for the source to remain an Area Source of HAPs.

Response 1:

NESHAP, Subpart MMMM applies to a source if the source performs metal parts surface coating operations and is a major source of HAPs.

Amsted Rail Company, Inc. performs metal parts surface coating operations. If Amsted Rail Company, Inc. becomes a major source of HAPs by not taking these limits, then the requirements of NESHAP, Subpart MMMM would apply to Amsted Rail Company, Inc. Therefore, the reference to NESHAP, Subpart MMMM have been included in the permit and TSD to document that the requirements of NESHAP, Subpart MMMM are triggered as soon as Amsted Rail Company, Inc. becomes major source of HAPs. This also makes it clear why it is necessary for the limits to

make this an area source for HAPs.

No change has been made due to this comment.

Comment 2:

Page 4 of 21 of the Technical Support Document
We request that the following statement be included on page 4 of 21 of the TSD, under 'Permit level Determination – Part 70 Modification to an Existing Source' section, to clarify that the source will remain an Area Source:

> The potential to emit (as defined in IAC 2-7-1(30)) of any single HAP, is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in IAC 2-7-1(30)) of any combination of HAPs is equal to or greater than twenty-five tons per year. However, the source has accepted to limit their single HAP emissions and total HAPs emissions below Major Source thresholds. Therefore, the source will be considered a Minor Source under Section 112 of the Clean Air Act.

Response 2:

It has been clarified in 'Federal Rule Applicability Determination' section of the TSD that the Amsted Rail Company, Inc. has proposed HAPs limits which limits the source-wide single HAP and combined HAPs emissions to less than 10 and 25 tons per year, respectively.

IDEM did not discuss about the proposed HAPs limits in 'Permit Level Determination – Part 70 Modification to an Existing Source' section of the TSD due to the reason explained as follows:

> The 'Permit Level Determination – Part 70 Modification to an Existing Source' section of the TSD discusses the permit level under 326 IAC 2-7-10.5. The PTE values used to determine the appropriate permit level under this section are based on Potential to Emit. Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”
>
> Although the Amsted Rail Company, Inc. proposed the HAPs limits to limit the source-wide single HAP and combined HAPs emissions to less than 10 and 25 tons per year, respectively, these limits are not federally enforceable for the purpose of permit level determination under 326 IAC 2-7-10.5. Therefore, reference to the proposed HAPs limits were not included in 'Permit Level Determination – Part 70 Modification to an Existing Source' section of the TSD.

No change has been made due to this comment.

IDEM Contact

(a) Questions regarding this proposed can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-6868 or toll free at 1-800-451-6027 extension 3-6868.

(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 Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Amsted Rail Company, Inc.
Source Location:	4831 Hohman Avenue, Hammond, Indiana 46327
County:	Lake
SIC Code:	3493 (Steel Springs, Except Wire)
Operation Permit No.:	T089-33178-00204
Operation Permit Issuance Date:	July 22, 2014
Significant Source Modification No.:	089-34712-00204
Significant Permit Modification No.:	089-34725-00204
Permit Reviewer:	Mehul Sura

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T089-33178-00204 on July 22, 2014. The source has not received any approval after Part 70 Operating Permit Renewal No. T089-33178-00204 was issued.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O_3	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard. [12]
$PM_{2.5}$	Unclassifiable or attainment effective February 6, 2012, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard.
[2]The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.

(a) 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 U.S. EPA in the U.S. 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_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(b) $PM_{2.5}$
Lake County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Source Status - Existing Source

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

Pollutant	**Emissions** (ton/yr)
PM	149.49
PM_{10}	87.06
$PM_{2.5}$	50.05
SO_2	1.42
NO_X	59.00
VOC	143.61
CO	38.54
GHGs as CO_2e	53,215.67
combination of HAPs	<25
single HAP	<10

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

(b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO_2 equivalent (CO_2e) emissions per year. GHG emissions do not affect the source PSD status.

(c) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because ozone precursors (VOC) are emitted at a rate of 100 tons per year or more.

(d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an

area source under Section 112 of the Clean Air Act (CAA).

(e) These emissions are based upon Part 70 Operating Permit Renewal No. T089-33178-00204, issued on July 22, 2014.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Amsted Rail Company, Inc. on July 15, 2014, relating to the following:

(I) Add new emission units described as follows:

(a) XL Line Coil Spring Manufacturing Process, with a maximum capacity of 15.65 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2838A, approved in 2014 for construction, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, approved in 2014 for construction, with a maximum design capacity of 10 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

(b) One (1) Shot Peener, identified as 3-1827, approved in 2014 for construction, with a maximum capacity of 15.65 tons of steel parts per hour, using a baghouse, identified as 3-1827A, for particulate matter control, and venting inside.

(c) One (1) natural gas-fired Small Line Slot Furnace, identified as 2-5006A, approved in 2014 for construction, with a maximum design capacity of 4 MMBtu/hr heat input, venting inside and no control.

(II) Revise description and modify throughput of the following existing emission units as follows:

emission unit ID	**existing description**	**existing throughput** (MMBtu/hr)	**revised description**	**revised throughput** (MMBtu/hr)
2-5075	medium line bar furnace (2-5075)	13	XL line bar furnace (2-5075)	22
2-5006	small line slot furnace (2-5006)	1.5	*	4
2-5014	medium line slot furnace (2-5014)	5.2 (for Units 2-5014 and 2-5015 combined)	XL line slot furnace (2-5014)	4
2-5015	medium line slot furnace (2-5015)		XL line slot furnace (2-5015)	4
2-5201	line 4 slot furnace (2-5201)	1.25	*	4

* No change in the description.

(III) Remove the existing emission units described as follows:

(a) Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2838A, constructed in 2011, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, constructed in 2011, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Total PTE Increase due to the Modification			
Pollutant	**PTE New Emission Units** (ton/yr)	**Net Increase to PTE of Modified Emission Units** (ton/yr)	**Total PTE for New and Modified Units** (ton/yr)
PM	1,028.32	0.09	1,028.41
PM_{10}	864.15	0.34	864.49
$PM_{2.5}$	864.15	0.34	864.49
SO_2	0.04	0.03	0.06
NO_X	6.01	4.53	10.54
VOC	3.40	0.25	3.65
CO	5.05	3.81	8.85
CO2e	7,251.91	5,468.66	12,720.57
HAPs	11.52	0.09	11.60
single HAP	6.03 (Mn)	-	6.03 (Mn)

(a) Significant Source Modification – approval to construct

This source modification is subject to 326 IAC 2-7-10.5(g)(4)(A) because the PTE of PM, PM10 and PM2.5, each, is greater than 25 tons per year.

(b) Significant Permit Modification – approval to operate

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because this modification requires significant changes to the permit conditions, such as adding PSD minor limits for the new units and compliance monitoring to comply with these limits.

Permit Level Determination – PSD

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

The table shows the existing and proposed emissions units after the issuance of the proposed modification.

Potential To Emit of the Entire Source After Issuance of the proposed modification (tons/year)										
	Process	**Emission Unit ID**	**PM**	**PM10**	**PM2.5***	**SO2**	**NOx**	**VOC**	**CO**	**CO2e**
existing emission units	Grinders	3-0244	67.76 (a)	9.13 (a)	4.34 (a)	-	-	-	-	-
		3-0247				-	-	-	-	-
		3-0249				-	-	-	-	-
		3-0385				-	-	-	-	-
		3-0386				-	-	-	-	-
		3-0389				-	-	-	-	-
		3-0393				-	-	-	-	-
		3-0394				-	-	-	-	-
		3-0396		8.28 (a)		-	-	-	-	-
		3-0397		11.54 (a)		-	-	-	-	-
existing emission units	Quench Tanks	3-2821	13.01 (a)	4.60 (a)	4.60 (a)	-	-	3.07	-	-
		3-2845	13.01 (a)	7.67 (a)	7.67 (a)	-	-	3.07	-	-
		3-4000	13.53 (a)	13.53 (a)	13.53 (a)	-	-	3.07	-	-
proposed emission unit		3-2838A	39.03 (b)	39.03 (b)	39.03 (b)	-	-	3.07		
existing emission units	Paint Booths and Dip Tanks	3-2714	0.35	0.35	0.35	-	-	0.75	-	-
		3-2715	0.59	0.59	0.59	-	-	1.25	-	-
		3-2813	-	-	-	-	-	13.26	-	-
		3-2865	-	-	-	-	-	13.26	-	-
		3-2865A	-	-	-	-	-	13.26	-	-
		3-2867	-	-	-	-	-	13.26	-	-
		3-2870	-	-	-	-	-	13.26	-	-
		3-2874A	-	-	-	-	-	13.26	-	-
		3-2874B	-	-	-	-	-	13.26	-	-
		3-2869	-	-	-	-	-	9.78	-	-
		3-2872	-	-	-	-	-	9.78	-	-
		3-2873	-	-	-	-	-	9.78	-	-
existing emission units	Shot Peeners	3-1804	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-
		3-1821	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-
		3-1823	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-
		3-1824	4.34 (a)	4.34 (a)	0.26 (a)	-	-	-	-	-
		3-1825	4.34 (a)	4.34 (a)	0.26 (a)	-	-	-	-	-
		3-1826	4.51 (a)	4.51 (a)	0.26 (a)	-	-	-	-	-
proposed emission unit		3-1827	13.53 (b)	13.53 (b)	13.53 (b)					
existing emission units	NG Combustion	-	0.79	3.14	3.14	0.25	41.35	2.27	34.74	52,558.73
proposed emission unit	Small Line Slot Furnace	2-5006A	0.03	0.13	0.13	0.01	1.72	0.09	1.44	2073.43
	XL Line draw furnace	2-5097	0.08	0.33	0.33	0.03	4.29	0.24	3.60	5178.49
existing emission units	Degreasers	-	-	-	-	-	-	3.52	-	-
	Fire pump engine	-	1.25	1.25	1.25	1.17	17.65	1.43	3.80	656.93
Total PTE of Entire Source			**189.23**	**127.38**	**90.37**	**1.48**	**69.03**	**147.23**	**46.96**	**62673.18**
Title V Major Source Thresholds			**NA**	**100**	**100**	**100**	**100**	**100**	**100**	**100,000**
PSD Major Source Thresholds			**250**	**250**	**250**	**250**	**-**	**--**	**250**	**100,000**
Emission Offset Major Source Thresholds			**-**	**-**	**-**	**-**	**100**	**100**	**-**	**-**

This table is the simplified version of the table above.

Potential To Emit of the Entire Source After Issuance of the proposed modification (tons/year)									
Process	**Emission Unit ID**	**PM**	**PM10**	**PM2.5***	**SO2**	**NOx**	**VOC**	**CO**	**CO2e**
Grinders	3-0244	67.76 (a)	9.13 (a)	4.34 (a)	-	-	-	-	-
	3-0247				-	-	-	-	-
	3-0249				-	-	-	-	-
	3-0385				-	-	-	-	-
	3-0386				-	-	-	-	-
	3-0389				-	-	-	-	-
	3-0393				-	-	-	-	-
	3-0394				-	-	-	-	-
	3-0396		8.28 (a)		-	-	-	-	-
	3-0397		11.54 (a)		-	-	-	-	-
Quench Tanks	3-2821	13.01 (a)	4.60 (a)	4.60 (a)	-	-	3.07	-	-
	3-2845	13.01 (a)	7.67 (a)	7.67 (a)	-	-	3.07	-	-
	3-4000	13.53 (a)	13.53 (a)	13.53 (a)	-	-	3.07	-	-
	3-2838A	39.03 (b)	39.03 (b)	39.03 (b)	-	-	3.07		
Paint Booths and Dip Tanks	3-2714	0.35	0.35	0.35	-	-	0.75	-	-
	3-2715	0.59	0.59	0.59	-	-	1.25	-	-
	3-2813	-	-	-	-	-	13.26	-	-
	3-2865	-	-	-	-	-	13.26	-	-
	3-2865A	-	-	-	-	-	13.26	-	-
	3-2867	-	-	-	-	-	13.26	-	-
	3-2870	-	-	-	-	-	13.26	-	-
	3-2874A	-	-	-	-	-	13.26	-	-
	3-2874B	-	-	-	-	-	13.26	-	-
	3-2869	-	-	-	-	-	9.78	-	-
	3-2872	-	-	-	-	-	9.78	-	-
	3-2873	-	-	-	-	-	9.78	-	-
Shot Peeners	3-1804	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-
	3-1821	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-
	3-1823	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-
	3-1824	4.34 (a)	4.34 (a)	0.26 (a)	-	-	-	-	-
	3-1825	4.34 (a)	4.34 (a)	0.26 (a)	-	-	-	-	-
	3-1826	4.51 (a)	4.51 (a)	0.26 (a)	-	-	-	-	-
	3-1827	13.53 (b)	13.53 (b)	13.53 (b)					
NG Combustion	-	0.79	3.14	3.14	0.25	41.35	2.27	34.74	52,558.73
Small Line Slot Furnace	2-5006A	0.03	0.13	0.13	0.01	1.72	0.09	1.44	2073.43
XL Line draw furnace	2-5097	0.08	0.33	0.33	0.03	4.29	0.24	3.60	5178.49
Degreasers	-	-	-	-	-	-	3.52	-	-
Fire pump engine	-	1.25	1.25	1.25	1.17	17.65	1.43	3.80	656.93
Total PTE of Entire Source		**189.23**	**127.38**	**90.37**	**1.48**	**69.03**	**147.23**	**46.96**	**62673.18**
Title V Major Source Thresholds		**NA**	**100**	**100**	**100**	**100**	**100**	**100**	**100,000**
PSD Major Source Thresholds		**250**	**250**	**250**	**250**	**-**	**--**	**250**	**100,000**
Emission Offset Major Source Thresholds		**-**	**-**	**-**	**-**	**100**	**100**	**-**	**-**

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

(a) PTE is based on the existing PSD minor limits in the permit.

(b) PTE is based on the following limits proposed by the source:

Emission Unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
XL line oil quench tank (3-2838A)	8.91	8.91	8.91
shot peener (3-1827)	3.09	3.09	3.09

Compliance with the existing PSD minor limits in the permit and the proposed PSD minor limits specified above, and the unrestricted potential to emit of PM, PM10 and PM2.5 from all other equipment at this source will limit the potential to emit of PM, PM10 and PM2.5 from the entire source to less than two hundred fifty (250) tons per year, each, and render 326 IAC 2-2 not applicable.

All of the remaining PTEs are uncontrolled emission rates.

This modification to an existing minor PSD stationary source is not major because:

(a) The emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD major source thresholds; and

(b) The emissions increase of GHGs from this modification to an existing minor PSD source are less than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

Permit Level Determination – Emission Offset

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

This source is located in Lake County which is currently nonattainment for 8-hour ozone standard. This source is also major for VOC. Therefore, VOC and NOx are compared to the Emission Offset Significant Levels (see table below).

			Potential To Emit of the proposed and modified emission units (tons/year)	
	Process	**Emission Unit ID**	**NOx**	**VOC**
Net Increase due to the proposed emission unit	Quench Tank	3-2838A	-	3.07
	Shot Peener	3-1827	-	-
	Small Line Slot Furnace	2-5006A	1.72	0.09
	XL Line draw furnace	2-5097	4.29	0.24
Net Increase to due to the Modified Emission Units			4.53	0.25
Emission Offset Significant Level			**40**	**40**

This modification to an existing major Emission Offset stationary source is not major because the emissions increase of VOC and NOx, are less than 40 tons per year, each. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part

60) included due to this proposed modification.

NESHAP:

(a) Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

The source-wide potential emissions of single HAP and combined HAPs are now more than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs due to the addition of the proposed emission units. The source has proposed the following limits in order to limit the source-wide single HAP and combined HAPs emissions to less than 10 and 25 tons per year, respectively:

Emission Unit	ID	single HAP (Mn) Limit (lb/hr)	single HAP (Cr) Limit (lb/hr)	combined HAPs Limit (lb/hr)
pangborn shotpeener	3-1804	0.033	0.030	0.063
wheelabrator shot peener	3-1821	0.033	0.030	0.063
wheelabrator shot peener	3-1823	0.033	0.030	0.063
shot peener	3-1824	0.033	0.030	0.063
shot peener	3-1825	0.033	0.030	0.063
shot peener	3-1826	0.033	0.030	0.063
shot peener	3-1827	0.102	0.093	0.195

The Single HAP limits in above table are calculated as follows:

Single HAP (Mn/Cr) Limit (lb/hr)	=	PM Limit of the subject shot peener (lb/hr)	x	Mn/Cr Content in steel shots (%)	x	3 (Margin Factor)

The margin factor of 3 is included in the above equation to make the limit less stringent.

The Combined HAPs limits in above table are calculated as follows:

Combined HAPs Limit (lb/hr)	=	Single HAP (Mn) Limit (lb/hr)	+	Single HAP (Cr) Limit (lb/hr)

Compliance with these limits, in conjunction with HAP emissions from other emission units at the source will limit source-wide single HAP and combined HAPs emissions to less than 10 and 25 tons per year, respectively, and render the requirements of 40 CFR Part 63, Subpart MMMM not applicable.

(b) There are no major source NESHAP (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included due to this proposed modification.

(c) Subpart XXXXXX — National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

This type source is not described in Table 1 of this NESHAP. Therefore, shot peener (3-1827) is not subject to the requirements of this NESHAP.

(d) There are no area source NESHAP (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included due to this proposed modification.

CAM:

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

following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

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

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

The following modified emission units and proposed emission units are not equipped with any pollutant-specific add-on controls. Therefore, CAM for does not apply for these emission units.

modified emission units	Medium line bar furnace (2-5075)
	Small line slot furnace (2-5006)
	Medium line slot furnace (2-5014)
	Medium line slot furnace (2-5015)
	Line 4 slot furnace (2-5201)
proposed emission units	Small Line Slot Furnace (2-5006A)
	XL Line draw furnace (2-5097)

XL line oil quench tank (3-2838A) and shot peener (3-1827) are equipped with pollutant-specific add-on controls. The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each of these emission units:

CAM Applicability Analysis								
Emission Unit	**Pollutant**	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled PTE** (ton/yr)	**Controlled PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
XL line quench tank (3-2838A)	PM	Y	Y	>100	<100	100	Y	N
	PM10	Y	Y	>100	<100	100	Y	N
	PM2.5	Y	Y	>100	<100	100	Y	N
	VOC	N	N	-	-	100	N	NA
shot peener (3-1827)	PM	Y	Y	>100	<100	100	Y	N
	PM10	Y	Y	>100	<100	100	Y	N
	PM2.5	Y	Y	>100	<100	100	Y	N
	Single HAP	Y	Y	<10	<10	10	N	NA
	Combined HAPs	Y	Y	<25	<25	25	N	NA

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to XL line oil quench tank (3-2838A) (for PM, PM10, PM2.5) and shot peener (3-1827) (for PM, PM10, PM2.5) upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

State Rule Applicability Determination

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

326 IAC 2-3 (Emission Offset)
Emission Offset applicability is discussed under the Permit Level Determination – Emission Offset section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential single HAP and combined HAPs emissions from each of the emission units listed

below are less than less than 10 tons per year for a single HAP and 25 tons per year, respectively. Therefore, 326 IAC 2-4.1 does not apply to these emission units.

(a) Proposed emission units

(i) shot peener (3-1827)
(ii) small line slot furnace (2-5006A)
(iii) XL line draw furnace (2 5097)
(iv) XL line oil quench tank (3 2838A)

(b) Modified emission units

(i) Medium line bar furnace (2-5075)
(ii) Small line slot furnace (2-5006)
(iii) Medium line slot furnace (2-5014)
(iv) Medium line slot furnace (2-5015)
(v) Line 4 slot furnace (2-5201)

326 IAC 6.8 PM Limitations for Lake County

(a) The facilities listed below are not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11, therefore these facilities are subject to the requirements of 326 IAC 6.8-1-2. Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from these facilities shall not exceed 0.03 grains/dscf.

(i) XL line oil quench tank (3-2838A)

(ii) shot peener (3-1827)

(b) Pursuant to 326 IAC 6.8-2-4(b), the following furnaces shall burn natural gas only:

(i) XL line draw furnace (2-5097)

(ii) small line slot furnace (2-5006A)

Compliance Determination and Monitoring Requirements

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

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

Compliance Determination Requirements

(a) In order comply with 326 IAC 2-2 limits specified in 'Permit Level Determination – PSD' and 326 IAC 6.8 limit specified in 'State Rule Applicability Determination' sections of this TSD, the controls listed in the table below shall be in operation and control particulate emissions when the associated emission unit with these controls is in operation.

Control Device	Associated Emission Unit
oil smoke filter (3-3027A)	XL line quench tank (3-2838A)
baghouse (3-3017)	shot peener (3-1827)

(b) In order comply with HAPs limits specified in 'Federal Rule Applicability Determination' section of this TSD, the baghouses listed in the table below shall be in operation and control HAPs emissions when the associated shot peener with these baghouses is in operation.

Baghouse ID	Associated Shot Peener ID
3-3017	3-1804
3-3022	3-1821
3-1823	3-1823
3-3024	3-1824
3-3025	3-1825
3-1826A	3-1826
3-1827A	3-1827

Compliance Monitoring Requirements

(a) Proposed emission units

Emission ID	Control	Parameter	Frequency
XL line quench tank (3-2838A)	oil smoke filter (3-3027A)	filter inspection*	each calendar quarter
shot peener (3-1827)	baghouse (3-1827A)	pressure drop	daily
		baghouse inspection	each calendar quarter **

* The oil smoke filter (3-3027A) is not a baghouse, therefore, a pressure drop parametric monitoring has not been included for this filter. The XL line oil quench tank (3- 2838A) is venting inside therefore a visible emissions monitoring requirement has not been included for this filter. The filter inspection requirement has been included to ensure that this oil smoke filter is routinely checked for its breakdown or failure.

** The shot peener (3-1827) is venting inside, therefore, the baghouse inspection requirement (instead of visible emission monitoring requirement) is included for this shot peener.

These monitoring conditions are necessary because the oil smoke filter must operate properly to ensure compliance with 326 IAC 6.8, 326 IAC 2-2 and 326 IAC 2-7.

These monitoring conditions are necessary because the baghouse must operate properly to ensure compliance with 326 IAC 6.8, 326 IAC 2-2, 326 IAC 2-7 and to render the requirements of NESHAP, Subpart MMMM not applicable.

(b) Existing emission units

Shot Peener ID	Baghouse ID	Parameter	Frequency
3-1804	3-3017	baghouse inspection*	each calendar quarter
3-1821	3-3022		
3-1823	3-1823		
3-1824	3-3024		
3-1825	3-3025		
3-1826	3-1826A		

* Upon further review, IDEM has included the baghouse inspection requirements for the above listed baghouses. These monitoring conditions are necessary to ensure that the baghouses are operating properly in order to comply with:

(i) 326 IAC 2-2 (PSD) minor limits and 326 IAC 6.8 limits specified in the existing permit for these shot peeners,

(ii) 326 IAC 2-7 (Part 70), and

(iii) the proposed HAPs limits to render the requirements of NESHAP, Subpart MMMM not applicable.

Testing Requirements

(a) PM, PM10 and PM2.5

Emission Unit	Control Device	Pollutant *	Timeframe for Testing	Frequency of Testing
XL line quench tank (3-2838A)	oil smoke filter (3-3027A)	PM, PM10 and PM2.5 ***	no later than 180 days after the initial startup of the XL line oil quench tank (3-2838A)	once every five (5) years
shot peener (3-1827)	baghouse (3-1827A)	PM, PM10 and PM2.5 ***	no later than 180 days after the initial startup of the shot peener (3-1827)	once every five (5) years**

* PM10 and PM2.5 includes filterable and condensable PM.

** The permit includes repeat testing requirement for the existing shot peeners. This repeat testing requirement allows the source to perform the repeat testing on any two (2) of the existing shot peeners such that the time period between tests on each the existing shot peeners does not exceed fifteen (15) years.

However, the repeat testing frequency of the proposed shot peener (3-1827) is not streamlined with the repeat testing frequency of the existing shot peeners because the proposed shot peener (3-1827) has potential emissions significantly higher than the potential emissions of the existing shot peeners. Therefore, the repeat testing frequency for the proposed shot peener (3-1827) is once every five (5) years.

*** For the subject emission unit, the Permittee has an option to comply with the testing requirements concurrently through one compliance test for PM, PM10 and PM2.5.

There are no testing requirements for the Small Line Slot Furnace and XL Line Draw Furnace because their PTEs are low.

(b) HAPs Testing Requirement for the shot peeners

Less than 93% control efficiency is required for the baghouses equipped on the shot peeners to meet the HAPs limits specified in 'Federal Rule Applicability Determination' section of this TSD (please refer Page 7 of 7 of TSD Appendix A for the calculation detail of the required HAPs control efficiency).The limited source-wide single HAP and combined HAPs PTEs are 1.31 and 7.63 tons per year, respectively, based on these HAPs limits. These values are significantly lower than the single HAP and combined HAPs major source thershold of NESHAP. Therefore, the HAPs testing requirement for these baghouse is not included in this proposed modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T089-33178-00204. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) The proposed modification has been included in the permit.

(b) There was typographical error in Condition D.2.7. This condition was referencing

incorrect emission unit IDs instead of control IDs. This error has been corrected.

(c) The existing quench oil heater ID has been changed for 2-5204 B to 2-5204B throughout the permit for the consistency purpose.

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

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

(a) Two (2) Natural gas-fired furnaces, equipped with no control and venting inside, which include the following units:

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)	Year Constructed**/Modified**
2-5027	Large Line Bar Furnace	20.5	1938
2-5075	~~Medium~~**XL** Line Bar Furnace	~~13.0~~**22.0**	1956**/2014**

. . .

(c) . . .

(2) ~~Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, includes:~~

~~(i) One (1) oil quench tank, identified as 3-2838A, constructed in 2011, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.~~

~~(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, constructed in 2011, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.~~

XL Line Coil Spring Manufacturing Process, with a maximum capacity of 15.65 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2838A, approved in 2014 for construction, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, approved in 2014 for construction, with a maximum design capacity of 10 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

. . .

. . .

(f) Seven~~Six~~ (~~6~~**7**) Shot Peeners, which include the following units:

. . .

(7) One (1) Shot Peener, identified as 3-1827, approved in 2014 for construction, with a maximum capacity of 15.65 tons of steel parts per hour, using a baghouse, identified as 3-1827A, for particulate matter control, and venting inside.

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

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

(a) . . .

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)
2-5006	Small Line Slot Furnace	~~1.5~~**4.0**
2-5006A	**Small Line Slot Furnace**	**4.0**
2-5007	Small Line Slot Furnace	1.5
2-5014	~~Medium~~**XL** Line Slot Furnace	~~5.2~~**4.0** ~~(for Units 2-5014 and 2-5015 combined)~~
2-5015	~~Medium~~**XL** Line Slot Furnace	**4.0**
2-5036	Large Line Slot Furnace	2.5
2-5085	Small Line Bar Furnace	8.0
2-5201	Line 4 Slot Furnace	~~1.25~~**4.0**
2-5202	Line 4 Slot Furnace	1.25
2-5203A	Line 4 Bar Furnace	6.5

. . .

(l) Two (2) quench oil heaters, constructed in 2012, identified as 2-5204A and 2-5204**B** ~~B~~, and rated at 2.5 MMBtu/hr, each.

. . .

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Coil Spring Grinders

(a) Two (2) Natural gas-fired furnaces, equipped with no control and venting inside, which include the following units:

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)	Year Constructed**/Modified**
2-5027	Large Line Bar Furnace	20.5	1938
2-5075	~~Medium~~**XL** Line Bar Furnace	~~13.0~~**22.0**	1956**/2014**

. . .

Insignificant Activities

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

Unit ID	Unit Description	Maximum Design Capacity (MMBtu/hr heat input)
2-5006	Small Line Slot Furnace	~~1.5~~**4.0**
2-5006A	**Small Line Slot Furnace**	**4.0**
2-5007	Small Line Slot Furnace	1.5

2-5014	~~Medium~~**XL** Line Slot Furnace	~~5.2~~**4.0** ~~(for Units 2-5014 and 2-5015 combined)~~
2-5015	~~Medium~~**XL** Line Slot Furnace	**4.0**
. . .	. . .	. . .
2-5201	Line 4 Slot Furnace	~~1.25~~**4.0**
. . .	. . .	. . .

(l) Two (2) quench oil heaters, constructed in 2012, identified as 2-5204A and 2-5204**B** ~~B~~, and rated at 2.5 MMBtu/hr, each.

. . .

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

D.1.1 Particulate Matter Limitations for Lake County [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2, the PM emissions after control from the quench oil heaters (2-5204A and 2-5204**B** ~~B~~) shall not exceed 0.03 grains/dscf.

. . .

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Coil Spring Manufacturing Process Lines

(c) Four (4) Coil Spring Manufacturing Process Lines, which include the following:

(1) . . .

(2) ~~Medium Line Coil Spring Manufacturing Process, with a maximum capacity of 5.0 tons/hr of coil springs manufactured, includes:~~

~~(i) One (1) oil quench tank, identified as 3-2838A, constructed in 2011, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.~~

~~(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, constructed in 2011, with a maximum design capacity of 5.1 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.~~

XL Line Coil Spring Manufacturing Process, with a maximum capacity of 15.65 tons/hr of coil springs manufactured, includes:

(i) One (1) oil quench tank, identified as 3-2838A, approved in 2014 for construction, using an oil smoke filter, identified as 3-3027A, to control particulate emissions (oil mists) generated during the quenching operation, and venting inside.

(ii) One (1) natural gas-fired draw furnace, identified as 2-5097, approved in 2014 for construction, with a maximum design capacity of 10 MMBtu/hr heat input, used to stress-relieve the newly coiled springs after the quench operation, no control.

. . .

. . .

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

D.2.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2]

(a) . . .

Emission Unit	ID	Emission Limit (lb/hr)
Small Line Coil Spring Manufacturing Process	3-2821	1.05
~~Medium Line Coil Spring Manufacturing Process~~	~~3-2838A~~	~~1.05~~
Large Line Coil Spring Manufacturing Process	3-2845	1.75

(b) Pursuant to 326 IAC 6.8-2-4(b), the Small Line draw furnace (2-5163), ~~Medium~~**XL** Line draw furnace (2-5097), Large Line draw furnace (2-5164) and Line 4 draw furnace (2-5097A) shall fire natural gas only.

Note: Since the emission limit for the Medium Line Coil Spring Manufacturing Process is specified in 326 IAC 6.8-1, the Permittee has to request a revision to reflect this change in the rule.

D.2.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a), the PM emissions after control from the **oil quench tank (3-2838A) of XL Line Coil Spring Manufacturing Process and** oil quench tank (3-4000) of Line 4 Coil Spring Manufacturing Process shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

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

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Small Line Quench Tank	3-2821	2.97	1.05	1.05
XL Line Quench Tank	**3-2838A**	**8.91**	**8.91**	**8.91**
~~Medium Line Quench Tank~~	~~3-2838A~~	~~2.97~~	~~2.97~~	~~2.97~~
Large Line Quench Tank	3-2845	2.97	1.75	1.75
Line 4 Quench Tank	3-4000	3.09	3.09	3.09

. . .

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

. . .

Emission Unit	ID
Small Line Quench Tank	3-2821
XL Line Quench Tank	**3-2838A**
Medium Line Quench Tank	~~3-2838A~~
Large Line Quench Tank	3-2845
Line 4 Quench Tank	3-4000

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

D.2.5 Particulate Control

. . .

(b) In order to ensure compliance with Conditions D.2.1(~~a~~**b**), **D.2.2** and D.2.3, the oil smoke filter equipped on the ~~Medium~~**XL** Line Coil Spring Manufacturing Process for PM, PM10, PM2.5 control shall be in operation and control emissions at all times when the

~~Medium~~**XL** Line Coil Spring Manufacturing Process is in operation.

. . .

D.2.6 Testing Requirements

(a) . . .

Emission Unit	ID
Small Line Coil Spring Manufacturing Process	3-2821
~~Medium Line Coil Spring Manufacturing Process~~	~~3-2838A~~
Large Line Coil Spring Manufacturing Process	3-2845

. . .

. . .

(c) . . .

Emission Unit	ID
Small Line Quench Tank	3-2821
~~Medium Line Quench Tank~~	~~3-2838A~~
Line 4 Quench Tank	3-4000

. . .

(d) . . .

(e) In order to demonstrate the compliance status with Conditions D.2.2 and D.2.3, the Permittee shall perform PM, PM10, and PM2.5 testing for XL line quench tank (3-2838A) no later than one hundred eighty (180) days after the initial startup of the XL line quench tank (3-2838A). This testing shall be conducted utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM10 and PM2.5 includes filterable and condensable PM.

(~~e~~**f**) . . .

The Permittee has an option to comply with the testing requirements specified in paragraphs (a) through (~~d~~**e**) above, concurrently through one compliance test for PM, PM10 and PM2.5 for each emission unit.

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

D.2.7 Oil Smoke Filter Inspections

An inspection shall be performed each calendar quarter of **the** oil smoke filters ~~3-4000, 3-2838A, 3-2845 and 3-2821~~**equiped on the quench tank (3-2821) and oil smoke filters (3-3027A, 3-3036 and 3-4001)** controlling it's associated quench tanks. All defective oil smoke filters shall be replaced.

. . .

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Shot Peeners

(f) . . .

(7) One (1) Shot Peener, identified as 3-1827, approved in 2014 for construction, with a maximum capacity of 15.65 tons of steel parts per hour, using a baghouse, identified as 3-1827A, for particulate matter control, and venting inside.

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

. . .

D.5.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the PM emissions after control from the facilities listed below shall not exceed the limits as specified below.

Emission Unit	ID	PM Emission Limit (grains/dscf)
Shot Peener	3-1824	0.03
	3-1825	0.03
	3-1826	0.03
	3-1827	**0.03**

D.5.3 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
. . .	. . .	. . .	. . .	. . .
Shot Peener	**3-1827**	**3.09**	**3.09**	**3.09**

Compliance with these limits combined with the limits in Conditions D.1.3 and D.2.3, and the unrestricted potential to emit of PM, PM10 and PM2.5 from all other equipment at this source will limit the potential to emit of PM, PM10 and PM2.5 from the entire source to less than two hundred fifty (250) tons per year, each, and render 326 IAC 2-2 not applicable.

D.5.4 Hazardous Air Pollutants [326 IAC 20] [40 CFR Part 63, Subpart MMMM]

In order to render the requirements of 40 CFR Part 63, Subpart MMMM not applicable, the Permittee shall comply with the following:

Emission Unit	ID	Single HAP (Mn) Limit (lb/hr)	Single HAP (Cr) Limit (lb/hr)	Combined HAPs Limit (lb/hr)
Pangborn ShotPeener	**3-1804**	**0.033**	**0.030**	**0.063**
Wheelabrator Shot Peener	**3-1821**	**0.033**	**0.030**	**0.063**
Wheelabrator Shot Peener	**3-1823**	**0.033**	**0.030**	**0.063**
Shot Peener	**3-1824**	**0.033**	**0.030**	**0.063**
Shot Peener	**3-1825**	**0.033**	**0.030**	**0.063**
Shot Peener	**3-1826**	**0.033**	**0.030**	**0.063**
Shot Peener	**3-1827**	**0.102**	**0.093**	**0.195**

Compliance with these limits, in conjunction with HAP emissions from other emission units at the source will limit source-wide single HAP and combined HAPs emissions to less than 10 and 25 tons per year, respectively, and render the requirements of 40 CFR Part 63, Subpart MMMM not applicable.

D.5.5~~D.5.4~~ Preventive Maintenance Plan [326 IAC 2-7-5(12)]

. . .

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

D.5.6~~D.5.5~~ Particulate Control [326 IAC 6.8-2] [326 IAC 2-7-6(6)] [326 IAC 2-1.1-5]

(a) In order to comply with Conditions D.5.1, D.5.2**,** ~~and~~ D.5.3 **and D.5.4**, the particulate **and HAPs** control devices equipped on the emission units listed in Conditions D.5.1, D.5.2**,** ~~and~~ D.5.3 **and D.5.4** shall be in operation and control emissions from its associated emission unit at all times that the associated emission unit is in operation.

. . .

D.5.7~~D.5.6~~ **Testing Requirements [326 IAC 2-1.1-11]**

. . .

(c) In order to demonstrate the compliance status with Conditions D.5.2 and D.5.3, the Permittee shall perform PM, PM10, and PM2.5 testing for the shot peener (3-1827) no later than one hundred eighty (180) days after the initial startup of the of shot peener (3-1827). This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

PM10 and PM2.5 includes filterable and condensable PM.

(~~c~~**d**) . . .

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

D.5.8 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse (3-1827A) used in conjunction with the shot peener (3-1827), at least once per day when the shot peener (3-1827) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.5.9 Baghouse Inspections

An inspection shall be performed for each of the baghouse specified below controlling its associated shot peener. The inspection shall be performed each calendar quarter and all defective bags shall be replaced.

Baghouse ID	Associated Shot Peener ID
3-3017	3-1804
3-3022	3-1821
3-1823	3-1823
3-3024	3-1824
3-3025	3-1825
3-1826A	3-1826
3-1827A	3-1827

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

D.5.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.5.8, the Permittee shall maintain daily records of the pressure drop across the baghouse (3-1827A) controlling the shot peener (3-1827). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

(b) To document the compliance status with Condition D.5.9, the Permittee shall maintain records of the results of the inspections required under Condition D.5.9.

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

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-34712-00204 and Significant Permit Modification No. 089-34725-00204. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-6868 or toll free at 1-800-451-6027 extension 3-6868.

(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 Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emission Calculations
Emission Summary

Company Name: Amsted Rail Company, Inc.
Address City IN Zip: 4831 Holman Avenue, Hammond, Indiana 46327
Significant Source Modification No.: 089-34712-00204
Significant Permit Modification No.: 089-34725-00204
Reviewer: Mehul Sura
Date: 07/21/2014

Uncontrolled Emissions (tons/yr)

	ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	single HAP (Mn)	combined HAPs	single HAP (Cr)
Grinders	3-0244	160.09	16.01	16.01	-	-	-	-	-	-	-	
	3-0247	67.76	6.78	6.78	-	-	-	-	-	-	-	
	3-0249	11.17	1.12	1.12	-	-	-	-	-	-	-	
	3-0385	115.41	11.54	11.54	-	-	-	-	-	-	-	
	3-0386	82.65	8.27	8.27	-	-	-	-	-	-	-	
	3-0389	40.95	4.10	4.10	-	-	-	-	-	-	-	
	3-0393	160.09	16.01	16.01	-	-	-	-	-	-	-	
	3-0394	26.06	2.61	2.61	-	-	-	-	-	-	-	
	3-0396	82.65	8.27	8.27	-	-	-	-	-	-	-	
	3-0397	115.41	11.54	11.54	-	-	-	-	-	-	-	
Quench Tanks	3-2821	45.99	45.99	45.99	-	-	3.07	-	-	-	-	
	3-2845	153.30	153.30	153.30	-	-	3.07	-	-	-	-	
	3-4000	160.97	160.97	160.97	-	-	3.07	-	-	-	-	
	3-2838A	479.83	479.83	479.83	-	-	3.07	-	-	-	-	
Paint Booths and Dip Tanks	3-2714	0.35	0.35	0.35	-	-	0.75	-	-	-	0.83	
	3-2715	0.59	0.59	0.59	-	-	1.25	-	-	-	1.41	
	3-2813	-	-	-	-	-	13.26	-	-	-	-	
	3-2865	-	-	-	-	-	13.26	-	-	-	-	
	3-2865A	-	-	-	-	-	13.26	-	-	-	-	
	3-2867	-	-	-	-	-	13.26	-	-	-	-	
	3-2870	-	-	-	-	-	13.26	-	-	-	-	
	3-2874A	-	-	-	-	-	13.26	-	-	-	-	
	3-2874B	-	-	-	-	-	13.26	-	-	-	-	
	3-2869	-	-	-	-	-	9.78	-	-	-	-	
	3-2872	-	-	-	-	-	9.78	-	-	-	-	
	3-2873	-	-	-	-	-	9.78	-	-	-	-	
Shot Peeners	3-1804	0.42	0.36	0.36	-	-	-	-	-	0.005	0.009	0.004
	3-1821	4.20	2.94	2.94	-	-	-	-	-	0.046	0.088	0.042
	3-1823	7.36	5.15	5.15	-	-	-	-	-	0.081	0.15	0.074
	3-1824	180.46	126.32	126.32	-	-	-	-	-	1.985	3.79	1.805
	3-1825	180.46	126.32	126.32	-	-	-	-	-	1.985	3.79	1.805
	3-1826	183.96	128.77	128.77	-	-	-	-	-	2.024	3.86	1.840
	3-1827	548.376	383.8632	383.8632	-	-	-	-	-	6.032	11.515896	5.484
Natural Gas Combustion		0.98	3.90	3.90	0.31	51.37	2.83	43.15	62,016	-	2.86	
Degreasers		-	-	-	-	-	3.52	-	-	-	-	
Fire pump engine		1.25	1.25	1.25	1.17	17.65	1.43	3.80	657		1.54E-02	
Total		2810.73	1706.13	1706.13	1.48	69.03	144.16	46.96	62673.18	12.16	28.33	11.05

Controlled/Limited PTE (tons/year)

	ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	single HAP (Mn)	combined HAPs	single HAP (Cr)
Grinders	3-0244	67.76 (a)	9.13 (a)	4.34 (a)	-	-	-	-	-	-	-	
	3-0247				-	-	-	-	-	-	-	
	3-0249				-	-	-	-	-	-	-	
	3-0385				-	-	-	-	-	-	-	
	3-0386				-	-	-	-	-	-	-	
	3-0389				-	-	-	-	-	-	-	
	3-0393				-	-	-	-	-	-	-	
	3-0394				-	-	-	-	-	-	-	
	3-0396		8.28 (a)		-	-	-	-	-	-	-	
	3-0397		11.54 (a)		-	-	-	-	-	-	-	
Quench Tanks	3-2821	13.01 (a)	4.60 (a)	4.60 (a)	-	-	3.07	-	-	-	-	
	3-2845	13.01 (a)	7.67 (a)	7.67 (a)	-	-	3.07	-	-	-	-	
	3-4000	13.53 (a)	13.53 (a)	13.53 (a)	-	-	3.07	-	-	-	-	
	3-2838A	39.03 (a)	39.03 (a)	39.03 (a)	-	-	3.07	-	-	-	-	
Paint Booths and Dip Tanks	3-2714	0.35	0.35	0.35	-	-	0.75	-	-	-	0.83	
	3-2715	0.59	0.59	0.59	-	-	1.25	-	-	-	1.41	
	3-2813	-	-	-	-	-	13.26	-	-	-	-	
	3-2865	-	-	-	-	-	13.26	-	-	-	-	
	3-2865A	-	-	-	-	-	13.26	-	-	-	-	
	3-2867	-	-	-	-	-	13.26	-	-	-	-	
	3-2870	-	-	-	-	-	13.26	-	-	-	-	
	3-2874A	-	-	-	-	-	13.26	-	-	-	-	
	3-2874B	-	-	-	-	-	13.26	-	-	-	-	
	3-2869	-	-	-	-	-	9.78	-	-	-	-	
	3-2872	-	-	-	-	-	9.78	-	-	-	-	
	3-2873	-	-	-	-	-	9.78	-	-	-	-	
Shot Peeners	3-1804	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-	0.145	0.276	0.145
	3-1821	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-	0.145	0.276	0.145
	3-1823	4.34 (a)	0.26 (a)	0.26 (a)	-	-	-	-	-	0.145	0.276	0.145
	3-1824	4.34 (a)	4.34 (a)	0.26 (a)	-	-	-	-	-	0.145	0.276	0.145
	3-1825	4.34 (a)	4.34 (a)	0.26 (a)	-	-	-	-	-	0.145	0.276	0.145
	3-1826	4.51 (a)	4.51 (a)	0.26 (a)	-	-	-	-	-	0.145	0.276	0.145
	3-1827	13.53 (a)	13.53 (a)	13.53 (a)	-	-	-	-	-	0.447	0.854	0.447
Natural Gas Combustion		0.98	3.90	3.90	0.31	51.37	2.83	43.15	62016.25	-	2.86	
Degreasers		-	-	-	-	-	3.52	-	-	-	-	
Fire pump engine		1.25	1.25	1.25	1.17	17.65	1.43	3.80	656.93	-	0.02	
Total		189.23	127.38	90.37	1.48	69.03	144.16	46.96	62673.18	1.31	7.63	1.31

(a) PTE is based on PSD Minor Limit.
Natural gas combustion emissions includes combustion emissions from furnaces. There are no process emissions form the furnaces located at the source.

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Reviewer: Mehul Sura
Date: 07/21/2014

Degreasers

Solvent Used: Safety-Kleen Premium Solvent/Safety-Kleen Premium Gold Solvent

Each Degreaser

POLLUTANT	Solvent Density (lbs/gal)	Usage for one Degreaser (gal/hr)	Potential Emissions from one Degreaser (lbs/hr)	Potential Emissions from one Degreaser (lbs/day)	**Potential Emissions from one Degreaser (tons/yr)**	**Potential Emissions two Degreasers (tons/yr)**
VOC	6.70	0.06	0.40	9.65	1.76	3.52
HAPs	0	0	0.00	0.00	0.00	0.00

Methodology

Potential Emissions from one Degreaser (lbs/hr) = Solvent Density (lbs/gal) x Usage (gal/hr)

Potential Emissions from one Degreaser (lbs/day) = Potential Emissions (lbs/hr) x 24 (hrs/day)

Potential Emissions from one Degreaser (tons/yr) = Potential Emissions (lbs/day) x 365 (days/yr)

Potential Emissions from two Degreasers (tons/yr) = Potential Emissions from one Degreaser (tons/yr) x 2 (Number of Degreasers)

7 Shot Peeners

Unit ID	Steel shots usage (tons/hr)	Steel shots usage (lb/hr)	Emission Factor				Potential to Emit (tons/yr)					PSD Minor Limit (lb/hr)			single HAP Limit (lb/hr)		combined HAPs Limit (lb/hr)	Limited PTE	
			lb PM/lb steel shots	lb PM10/lb PM	Chromium (Cr) Content in steel shots	Manganese (Mn) Content in steel shots	PM	PM_{10}	$PM_{2.5}$	Cr	Mn	PM	PM_{10}	PM2.5	Cr	Mn	Cr + Mn	PM	PM_{10}
3-1804	0.012	24	0.004	0.86	1%	1.10%	0.42	0.36	0.36	0.0042	0.005	0.990	0.060	0.060	0.033	0.030	0.063	4.34	0.26
3-1821	0.12	240	0.004	0.70	1%	1.10%	4.20	2.94	2.94	0.0420	0.046	0.990	0.060	0.060	0.033	0.030	0.063	4.34	0.26
3-1823	0.21	420	0.004	0.70	1%	1.10%	7.36	5.15	5.15	0.0736	0.081	0.990	0.060	0.060	0.033	0.030	0.063	4.34	0.26
3-1824	5.15	10300	0.004	0.70	1%	1.10%	180.46	126.32	126.32	1.8046	1.985	0.990	0.990	0.060	0.033	0.030	0.063	4.34	4.34
3-1825	5.15	10300	0.004	0.70	1%	1.10%	180.46	126.32	126.32	1.8046	1.985	0.990	0.990	0.060	0.033	0.030	0.063	4.34	4.34
3-1826	5.25	10500	0.004	0.70	1%	1.10%	183.96	128.77	128.77	1.8396	2.024	1.030	1.030	0.060	0.033	0.030	0.063	4.51	4.51
3-1827	15.65	31300	0.004	0.70	1%	1.10%	548.38	383.86	383.86	5.4838	6.032	3.090	3.090	3.090	0.102	0.093	0.195	13.53	13.53

Methodology

PM and PM10 Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

PM2.5=PM10

Chromium and Manganese content in steel shots are provided by the source.

The single HAP and combined HAPs limits are proposed by the source.

Steel shots usage (lb/hr) = steel shots usage (tons/hr) x 1/2000 (lbs/ton)

PM PTE (tons/yr) = steel shots usage (lb/hr) x lb PM / lb steel shots x 8760 (hrs/yr) / 2000 (lbs/ton)

PM10 PTE (tons/yr) = steel shots usage (lb/hr) x lb PM / lb steel shots x lb PM10 / lb PM x 8760 (hrs/yr) / 2000 (lbs/ton)

PM2.5 PTE (tons/yr) = PM10 Potential Emissions (tons/yr)

Chromium Potential Emissions (tons/yr) = PM Potential Emissions (tons/yr) x Chromium Content in steel shots

Manganese Potential Emissions (tons/yr) = PM Potential Emissions (tons/yr) x Chromium Content in steel shots

Particulate Limited PTE (tons/yr) = PSD Minor Limit (lb/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)

HAP Limited PTE (tons/yr) = HAP Limit (lb/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)

10 Grinders

Unit ID	Throughput Rate (tons/hr)	BH Control Efficiency	Emission Factor (lb/ton steel)			PSD Minor Limit (lb/hr)			Potential Emissions (tons/yr)			PSD Minor Limited PTE (tons/yr)		
			PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	PM2.5	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$
3-0244	2.15	99%	17	1.7	1.7	0.990	2.085	0.990	160.09	16.01	16.01	4.34	9.13	4.34
3-0247	0.91	99%	17	1.7	1.7				67.76	6.78	6.78			
3-0249	0.15	99%	17	1.7	1.7				11.17	1.12	1.12			
3-0385	1.55	99%	17	1.7	1.7				115.41	11.54	11.54			
3-0386	1.11	99%	17	1.7	1.7				82.65	8.27	8.27			
3-0389	0.55	99%	17	1.7	1.7				40.95	4.10	4.10			
3-0393	2.15	99%	17	1.7	1.7				160.09	16.01	16.01			
3-0394	0.35	99%	17	1.7	1.7				26.06	2.61	2.61			
3-0396	1.11	99%	17	1.7	1.7		1.890		82.65	8.27	8.27		8.28	
3-0397	1.55	99%	17	1.7	1.7		2.640		115.41	11.54	11.54		11.56	

Methodology

Emission factors are from AP-42 Chapter 12.10, Gray Iron Foundries, Table 12.10-7, May 2003.

Potential Emissions (tons/yr) = Emission Factor (lb/ton steel) x Throughput Rate (tons/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)

Limited PTE (tons/yr) = PSD Minor Limit (lb/hr) x 8760 (hrs/yr) x 2000 (lbs/ton)

Appendix A: Emission Calculations
Coating Operations and Quench Tanks

Company Name: Amsted Rail Company, Inc.
Address City IN Zip: 4831 Holman Avenue, Hammond, Indiana 46327
Significant Source Modification No.: 089-34712-00204
Significant Permit Modification No.: 089-34725-00204
Reviewer: Mehul Sura
Date: 07/21/2014

4 Quench Tanks

Unit ID	Unit	Throughput Rate (tons/hr)	Emission Factor (lb/ton steel)			Emission Factor (lb/hr)	PSD Minor Limit (lb/hr)				Potential Emissions (tons/yr)				Limited PTE (tons/yr)			
			PM	PM_{10}	$PM_{2.5}$	VOC	PM	PM_{10}	PM2.5	VOC	PM	PM_{10}	$PM_{2.5}$	VOC	PM	PM_{10}	$PM_{2.5}$	VOC
3-2821	Small Line Quench Tank	1.5	7.0	7.0	7.0	0.7	2.970	1.050	1.050	--	45.99	45.99	45.99	3.07	13.01	4.60	4.60	3.07
3-2845	Large Line Quench Tank	5	7.0	7.0	7.0	0.7	2.970	1.750	1.750	--	153.30	153.30	153.30	3.07	13.01	7.67	7.67	3.07
3-4000	Line 4 Quench Tank	5.25	7.0	7.0	7.0	0.7	3.090	3.090	3.090	--	160.97	160.97	160.97	3.07	13.53	13.53	13.53	3.07
3-2838A	XL Quench Tank	15.65	7.0	7.0	7.0	0.7	8.910	8.910	8.910	--	479.83	479.83	479.83	3.07	39.03	39.03	39.03	3.07

$PM/PM_{10}/PM_{2.5}$ emission factors provided by the source are based on mass balance of the amount of oil used and the weight of units treated. These emission factors were used in SSM 089-31440-00204, issued for this source on July 2, 2012.
VOC emission factor is from compliance test performed for Medium Line Coil Spring Manufacturing Process on January 13, 2012.
Potential PM/PM10/PM2.5 Emissions (tons/yr) = Throughput Rate (tons/hr) x Emission Factor (lb/ton steel) x 8760 (hrs/yr) / 2000 (lbs/ton)
Potential VOC Emissions (tons/yr) = Emission Factor (lb/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)
Limited PM/PM10/PM2.5 PTE (tons/yr) = PM/PM10/PM2.5 PSD Minor Limit (lb/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)
Limited VOC PTE (tons/yr) = Potential VOC Emissions (tons/yr)

Paint Booths and Dip Tanks - PM and VOC

Unit ID	Process	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	usage (gal/hr)	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
3-2714	Paint Spray Booth	Aquacron 880	9.2	71.45%	41.1%	30.4%	0.0%	28.55%	0.061	2.79	2.79	0.17	4.09	0.75	0.35	9.78	50%
3-2715	Paint Spray Booth	Aquacron 880	9.2	71.45%	41.1%	30.4%	0.0%	28.55%	0.102	2.79	2.79	0.28	6.84	1.25	0.59	9.78	50%
3-2813	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	6.100	0.50	0.15	0.91	72.64	13.26	0.00	0.53	100%
3-2865	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	6.100	0.50	0.15	0.91	72.64	13.26	0.00	0.53	100%
3-2865A	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	6.100	0.50	0.15	0.91	72.64	13.26	0.00	0.53	100%
3-2867	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	6.100	0.50	0.15	0.91	72.64	13.26	0.00	0.53	100%
3-2870	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	6.100	0.50	0.15	0.91	72.64	13.26	0.00	0.53	100%
3-2874A	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	6.100	0.50	0.15	0.91	72.64	13.26	0.00	0.53	100%
3-2874B	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	6.100	0.50	0.15	0.91	72.64	13.26	0.00	0.53	100%
3-2869	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	4.500	0.50	0.15	0.67	53.58	9.78	0.00	0.53	100%
3-2872	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	4.500	0.50	0.15	0.67	53.58	9.78	0.00	0.53	100%
3-2873	Dip Coating	AW9012A Clear Coat	8.6	69.81%	68.1%	1.7%	69.9%	28.23%	4.500	0.50	0.15	0.67	53.58	9.78	0.00	0.53	100%
	Total PTE				**Add worst case coating to all solvents**							**8.83**	**680.12**	**124.12**	**0.94**		

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 = Worst Coating + Sum of all solvents used

Paint Booths- HAPs

Unit ID	Process	Material	Density (Lb/Gal)	usage (gal/hr)	Weight % Triethalamine	Weight % Cobalt Compounds	Triethalamine Emissions (ton/yr)	Cobalt Compounds Emissions (ton/yr)
3-2714	Paint Spray Booth	Aquacron 880	7.80	0.06100	20.00%	20.00%	0.42	0.42
3-2715	Paint Spray Booth	Aquacron 880	7.90	0.10200	25.00%	15.00%	0.88	0.53

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) x Usage (gal/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs
Only Aquacron 880 contains HAPs. No other coating material used at the source contain HAPs.

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: Amsted Rail Company, Inc.
Address City IN Zip: 4831 Holman Avenue, Hammond, Indiana 46327
Significant Source Modification No.: 089-34712-00204
Significant Permit Modification No.: 089-34725-00204
Reviewer: Mehul Sura
Date: 07/21/2014

Unit ID	Heat Input Capacity (MMBtu/hr)	HHV (mmBtu/mmscf)	Potential Throughput (MMCF/yr)
2-5085	8	1020	68.7
2-5006	1.5	1020	12.9
2-5163	5.1	1020	43.8
2-5075	22	1020	188.9
2-5014	4	1020	34.4
2-5015	4	1020	34.4
2-5027	20.5	1020	176.1
2-5036	2.5	1020	21.5
2-5164	9.8	1020	84.2
2-5006A	4	1020	34.4

Unit ID	Heat Input Capacity (MMBtu/hr)	HHV (mmBtu/mmscf)	Potential Throughput (MMCF/yr)
2-5097A	5	1020	42.9
2-5201	4	1020	34.4
2-5202	1.25	1020	10.7
2-5203A	6.5	1020	55.8
2-5203B	6.5	1020	55.8
2-5204A	2.5	1020	21.5
2-5204B	2.5	1020	21.5
2-5097	10	1021	85.8

	Pollutant (tons/yr)						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **	5.5	84
Emission Rate in lb/MMBtu	0.0019	0.0075	0.0075	0.0006	0.0980	0.0054	0.0824
2-5085	0.065	0.26	0.26	0.02	3.44	0.19	2.89
2-5006	0.012	0.05	0.05	0.00	0.64	0.04	0.54
2-5163	0.042	0.17	0.17	0.01	2.19	0.12	1.84
2-5075	0.179	0.72	0.72	0.06	9.45	0.52	7.94
2-5014	0.033	0.13	0.13	0.01	1.72	0.09	1.44
2-5015	0.033	0.13	0.13	0.01	1.72	0.09	1.44
2-5027	0.167	0.67	0.67	0.05	8.80	0.48	7.39
2-5036	0.020	0.08	0.08	0.01	1.07	0.06	0.90
2-5164	0.080	0.32	0.32	0.03	4.21	0.23	3.53
2-5006A	0.033	0.13	0.13	0.01	1.72	0.09	1.44
2-5097A	0.041	0.16	0.16	0.01	2.15	0.12	1.80
2-5201	0.033	0.13	0.13	0.01	1.72	0.09	1.44
2-5202	0.010	0.04	0.04	0.00	0.54	0.03	0.45
2-5203A	0.053	0.21	0.21	0.02	2.79	0.15	2.34
2-5203B	0.053	0.21	0.21	0.02	2.79	0.15	2.34
2-5204A	0.020	0.08	0.08	0.01	1.07	0.06	0.90
2-5204B	0.020	0.08	0.08	0.01	1.07	0.06	0.90
2-5097	0.082	0.33	0.33	0.03	4.29	0.24	3.60
Total	**0.976**	**3.904**	**3.904**	**0.308**	**51.375**	**2.826**	**43.155**

*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

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Rate in lb/MMBtu = Emission Factor (lb/MMCF) / 1020 (MMBtu/MMCF)
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

HAPs Emissions

	HAPs - Organics (tons/yr)					HAPs - Metals (tons/yr)				
	Benzene	Dichlorobenzen	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	0.002	0.001	0.075	1.800	0.003	0.001	0.001	0.001	0.000	0.002
2-5085	7.2E-05	4.1E-05	2.6E-03	6.2E-02	1.2E-04	1.7E-05	3.8E-05	4.8E-05	1.3E-05	7.2E-05
2-5006	1.4E-05	7.7E-06	4.8E-04	1.2E-02	2.2E-05	3.2E-06	7.1E-06	9.0E-06	2.4E-06	1.4E-05
2-5163	4.6E-05	2.6E-05	1.6E-03	3.9E-02	7.4E-05	1.1E-05	2.4E-05	3.1E-05	8.3E-06	4.6E-05
2-5075	2.0E-04	1.1E-04	7.1E-03	1.7E-01	3.2E-04	4.7E-05	1.0E-04	1.3E-04	3.6E-05	2.0E-04
2-5014	3.6E-05	2.1E-05	1.3E-03	3.1E-02	5.8E-05	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05
2-5015	3.6E-05	2.1E-05	1.3E-03	3.1E-02	5.8E-05	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05
2-5027	1.8E-04	1.1E-04	6.6E-03	1.6E-01	3.0E-04	4.4E-05	9.7E-05	1.2E-04	3.3E-05	1.8E-04
2-5036	2.3E-05	1.3E-05	8.1E-04	1.9E-02	3.7E-05	5.4E-06	1.2E-05	1.5E-05	4.1E-06	2.3E-05
2-5164	8.8E-05	5.0E-05	3.2E-03	7.6E-02	1.4E-04	2.1E-05	4.6E-05	5.9E-05	1.6E-05	8.8E-05
2-5006A	3.6E-05	2.1E-05	1.3E-03	3.1E-02	5.8E-05	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05
2-5097A	4.5E-05	2.6E-05	1.6E-03	3.9E-02	7.3E-05	1.1E-05	2.4E-05	3.0E-05	8.2E-06	4.5E-05
2-5201	3.6E-05	2.1E-05	1.3E-03	3.1E-02	5.8E-05	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05
2-5202	1.1E-05	6.4E-06	4.0E-04	9.7E-03	1.8E-05	2.7E-06	5.9E-06	7.5E-06	2.0E-06	1.1E-05
2-5203A	5.9E-05	3.3E-05	2.1E-03	5.0E-02	9.5E-05	1.4E-05	3.1E-05	3.9E-05	1.1E-05	5.9E-05
2-5203B	5.9E-05	3.3E-05	2.1E-03	5.0E-02	9.5E-05	1.4E-05	3.1E-05	3.9E-05	1.1E-05	5.9E-05
2-5204A	2.3E-05	1.3E-05	8.1E-04	1.9E-02	3.7E-05	5.4E-06	1.2E-05	1.5E-05	4.1E-06	2.3E-05
2-5204B	2.3E-05	1.3E-05	8.1E-04	1.9E-02	3.7E-05	5.4E-06	1.2E-05	1.5E-05	4.1E-06	2.3E-05
2-5097	9.0E-05	5.1E-05	3.2E-03	7.7E-02	1.5E-04	2.1E-05	4.7E-05	6.0E-05	1.6E-05	9.0E-05
	0.003	**0.002**	**0.114**	**2.725**	**0.005**	**0.001**	**0.002**	**0.002**	**0.001**	**0.003**

Methodology is the same as above.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Emissions

	Greenhouse Gas (tons/yr)			Summed Potential Emissions in tons/yr	CO2e Total in tons/yr
	CO2	CH4	N2O		
Emission Factor in lb/MMcf	120,000	2.3	2.2		
2-5085	4,122	0.1	0.1	4,123	4,147
2-5006	773	0.0	0.0	773	778
2-5163	2,628	0.1	0.0	2,628	2,644
2-5075	11,336	0.2	0.2	11,337	11,404
2-5014	2,061	0.0	0.0	2,061	2,073
2-5015	2,061	0.0	0.0	2,061	2,073
2-5027	10,564	0.2	0.2	10,564	10,626
2-5036	1,288	0.0	0.0	1,288	1,296
2-5164	5,050	0.1	0.1	5,050	5,080
2-5006A	2,061	0.0	0.0	2,061	2,073
2-5097A	2,576	0.0	0.0	2,577	2,592
2-5201	2,061	0.0	0.0	2,061	2,073
2-5202	644	0.0	0.0	644	648
2-5203A	3,349	0.1	0.1	3,350	3,369
2-5203B	3,349	0.1	0.1	3,350	3,369
2-5204A	1,288	0.0	0.0	1,288	1,296
2-5204B	1,288	0.0	0.0	1,288	1,296
2-5097	5,148	0.1	0.1	5,148	5,178
Total				61,652	62,016

Methodology
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 (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)
Fire pump engine

Company Name: Amsted Rail Company, Inc.
Address City IN Zip: 4831 Holman Avenue, Hammond, Indiana 46327
Significant Source Modification No.: 089-34712-00204
Significant Permit Modification No.: 089-34725-00204
Reviewer: Mehul Sura
Date: 07/21/2014

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	130.0
Maximum Hours Operated per Year	8760
Potential Throughput (hp-hr/yr)	1,138,800

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	1.25	1.25	1.25	1.17	17.65	1.43	3.80

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	3.72E-03	1.63E-03	1.14E-03	1.56E-04	4.70E-03	3.06E-03	3.69E-04	6.70E-04

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)
****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	**1.54E-02**

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	1.15E+00	4.63E-05	9.26E-06
Potential Emission in tons/yr	6.55E+02	2.64E-02	5.27E-03

Summed Potential Emissions in tons/yr	**6.55E+02**
CO2e Total in tons/yr	**6.57E+02**

Methodology
Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2
CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]
Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Appendix A: Emission Calculations
Part 70 Modification PTE Summary

Company Name: Amsted Rail Company, Inc.
Address City IN Zip: 4831 Holman Avenue, Hammond, Indiana 46327
Significant Source Modification No.: 089-34712-00204
Significant Permit Modification No.: 089-34725-00204
Reviewer: Mehul Sura
Date: 07/21/2014

PTE Before Modification for the Existing Emission Unit (tons/yr)

	ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	single HAP	combined HAPs
Medium Line Bar Furnace	2-5075	0.106	0.424	0.424	0.033	5.582	0.307	4.689	6,738.63	0.01	0.11
Small Line Slot Furnace	2-5006	0.012	0.049	0.049	0.004	0.644	0.035	0.541	777.53	0.04	0.01
Medium Line Slot Furnace	2-5015	0.042	0.170	0.170	0.013	2.233	0.123	1.876	2,695.45	0.01	0.04
Line 4 Slot Furnace	2-5201	0.010	0.041	0.041	0.003	0.537	0.030	0.451	647.95	0.06	0.01
	Total	0.171	0.684	0.684	0.054	8.996	0.495	7.557	10,859.56	0.12	0.170

PTE After Modification for the Existing Emission Unit (tons/yr)

	ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	single HAP	combined HAPs
Medium Line Bar Furnace	2-5075	0.18	0.72	0.72	0.06	9.45	0.52	7.94	11403.84	0.17	0.18
Small Line Slot Furnace	2-5006	0.01	0.05	0.05	0.00	0.64	0.04	0.54	777.53	0.01	0.01
Medium Line Slot Furnace	2-5015	0.03	0.13	0.13	0.01	1.72	0.09	1.44	2073.43	0.03	0.03
Line 4 Slot Furnace	2-5201	0.03	0.13	0.13	0.01	1.72	0.09	1.44	2073.43	0.03	0.03
	Total	**0.26**	**1.03**	**1.03**	**0.08**	**13.53**	**0.74**	**11.36**	**16328.22**	**0.24**	**0.26**

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	single HAP	combined HAPs
Net PTE change of the existing emission units (SSM 34712)	0.09	0.34	0.34	0.03	4.53	0.25	3.81	5468.66	0.12	0.09

Uncontrolled emissions for the New Emission Units (tons/yr)

	ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	single HAP	combined HAPs	**Cr**	**Mn**
Quench Tank	3-2838A	479.83	479.83	479.83	-	-	3.07	-	-	-	-	-	-
Shot Peener	3-1827	548.38	383.86	383.86	-	-	-	-	-	6.03	11.52	5.48	6.03
Small Line Slot Furnace	2-5006A	0.03	0.13	0.13	0.01	1.72	0.09	1.44	2073.43	-	-	-	-
XL Line draw furnace	2-5097	0.08	0.33	0.33	0.03	4.29	0.24	3.60	5178.49	0.08	-	-	-
ions for the New Emission Units (tons/yr)	Total	1028.32	864.15	864.15	0.04	6.01	3.40	5.05	7251.91	6.11	11.52	5.48	6.03

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	single HAP	combined HAPs	Cr	Mn
PTE of modification for Part 70 Purpose (SSM 34712)	1028.41	864.49	864.49	0.06	10.54	3.65	8.85	12720.57	6.03	11.60	5.48	6.03

Methodology
PTE Before Modification for the Existing Emission Unit (tons/yr) are from Part 70 Operating Permit Renewal No. T089-33178-00204, issued on July 21, 2014.
Net PTE change of the existing emission units (tons/yr) = PTE After Modification for the Existing Emission Unit (tons/yr) - PTE Before Modification for the Existing Emission Unit (tons/yr)
PTE of modification for Part 70 Purpose (tons/yr) = Net PTE change of the existing emission units (tons/yr) + Uncontrolled emissions for the New Emission Units (tons/yr)

Appendix A: Emission Calculations

control efficiency requirement for the baghouse equipped on the shot peeners to meet the HAPs limits

Company Name: Amsted Rail Company, Inc.
Address City IN Zip: 4831 Holman Avenue, Hammond, Indiana 46327
Significant Source Modification No.: 089-34712-00204
Significant Permit Modification No.: 089-34725-00204
Reviewer: Mehul Sura
Date: 07/21/2014

	Uncontrolled Emissions (tons/yr)		Potential To Emit (tons/year)		Required control efficiency (%)	
Shot Peeners	Cr	Mn	Cr	Mn	Cr	Mn
3-1804	0.0042	0.005	0.145	0.14454	*	*
3-1821	0.042	0.046	0.145	0.14454	*	*
3-1823	0.0736	0.081	0.145	0.14454	*	*
3-1824	1.8046	1.985	0.145	0.14454	91.96	92.72
3-1825	1.8046	1.985	0.145	0.14454	91.96	92.72
3-1826	1.8396	2.024	0.145	0.14454	92.12	92.86
3-1827	5.4838	6.032	0.447	0.44676	91.85	92.59

Methodology

* Uncontrolled Emissions (tons/yr) are less than the Potential To Emit (tons/year).

Required control efficiency (%) = [(Uncontrolled Emissions (tons/yr) - Potential To Emit (tons/year)) x 100] / Uncontrolled Emissions (tons/yr)

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Governor

Thomas W. Easterly
Commissioner

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

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

DATE: September 26, 2014

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

SUBJECT: Final Decision
Title V Significant Source Modification
089-34712-00204

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Michael Reeder, GM
Erin Surinak, Environmental Resources Management (ERM)
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.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 26, 2014

TO: Hammond Public Library

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

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

Applicant Name: **Amsted Rail Company, Inc.**
Permit Number: **089-34712-00204**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

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3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 *(Local Official)*									
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5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 *(Affected Party)*									
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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		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 *(Affected Party)*									
12		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 *(Local Official)*									
13		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)									
14		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 *(Affected Party)*									
15		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 *(Affected Party)*									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			

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Mail Code 61-53

IDEM Staff	VHAUN 9/26/2014 Amsted Rail Company, Inc. 089-34712-00204 FINAL			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee / Remarks
1		Erin Surinak Environmental Resources Management (ERM) 11350 N Meridian Street Suite 320 Carmel IN 46032 (Consultant)									
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		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 *(Local Official)*									
6		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 *(Affected Party)*									
7		Ryan Dave 939 Cornwallis Munster IN 46321 *(Affected Party)*									
8		Matt Mikus 1710 Vale Park Rd Apt 302 Valparaiso IN 46383 *(Affected Party)*									
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)	
8			The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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