



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

for Progress Rail Service Corporation in Miami County

MSOP No.: M103-40669-00056

The Indiana Department of Environmental Management (IDEM) has received an application from Progress Rail Service Corporation, located at 405 Life Road, Peru, Indiana 46970, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Progress Rail Service Corporation to construct and operate a new stationary turbo remanufacturing facility that are used on locomotive engines.

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

Peru Public Library
102 E Main Street
Peru, IN 46970

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M103-40669-00056 in all correspondence.

Comments should be sent to:

Madhu Preetha Murali
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Madhu Preetha Murali or (317) 232-9064
Or dial directly: (317) 232-9064
Fax: (317) 232-6749 attn: Madhu Preetha Murali
E-mail: Mmurali@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Madhu Preetha Murali or my staff at the above address.



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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Commissioner

DRAFT

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Progress Rail Service Corporation
405 Life Road
Peru, Indiana 46970**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M103-40669-00056	
Master Agency Interest ID.: 46985	
Issued by:	Issuance Date:
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary turbo remanufacturing facility.

Source Address:	405 Life Road, Peru, Indiana 46970
General Source Phone Number:	256-505-6125
SIC Code:	3743 (Railroad Equipment)
County Location:	Miami (Peru Township)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Ten (10) natural gas fired furnaces, identified as SpaceHeat 1 to 10, approved in 2018 for construction, each with a maximum heat input capacity of 0.4 MMBtu per hour, no control and exhausting to stacks SV05 to SV14.
- (b) One (1) natural gas fired oven, identified as Guspro Oven, approved in 2018 for construction, with a maximum heat input capacity of 10 MMBtu per hour, no control and exhausting to stack SV15.
- (c) Two (2) propane combusting turbo test cells, identified as Turbo Test 1 and 2, approved in 2018 for construction, each with a maximum heat input capacity of 12.34 MMBtu per hour, no control and exhausting to stack SV01 and SV02.
- (d) Two (2) natural gas fired washers, collectively identified as Wash3, approved in 2018 for construction, each with a maximum heat input capacity of 2 MMBtu per hour, no control and exhausting to stack SV03 and SV04.
- (e) One (1) cold solvent magnetic testing unit, identified as Mag Test, approved in 2018 for construction, with a maximum capacity of 50 gallons per year, using no control and exhausting to atmosphere.
- (f) Ten (10) abrasive blasting units, collectively identified as Blast, approved in 2018 for construction, each with a maximum throughput of 100,000 pounds per hour of steel shot, using ten (10) baghouses as control, and exhausting to atmosphere and consisting of the following:
 - (1) One (1) steel shot blaster, identified as B66.
 - (2) One (1) steel shot blaster, identified as 2101.
 - (3) Two (2) steel shot blasters, identified as em57621 and em56897.
 - (4) Three (3) ceramic bead blasters, identified as G34, E125 and E126.

- (5) Three (3) empire glass bead blasters, identified as 2196, 2103, 2104.
- (g) One (1) surface coating operation, identified as Paint, approved in 2018 for construction, with a maximum capacity of 0.06 gallons per hour, coating turbo housings, using dry filter as control, and exhausting to stack SV16.
- (h) One (1) welding and cutting operation, identified as Weld, approved in 2018 for construction, with a maximum electrode consumption of 2.1 pound per hour, using no control, and exhausting to atmosphere, and consisting of:
 - (1) Fifteen (15) welding stations for welding steel (not stainless steel).
 - (2) Portable plasma cutters.
- (i) One (1) Machining operation, identified as MachOp, approved in 2018 for construction, using aqueous based cutting coolant and no control, and exhausting to atmosphere.
- (j) Five (5) cold solvent washers, approved in 2018 for construction, with a maximum capacity of 910 gallons per year of solution, no control and exhausting to atmosphere, consisting of the following:
 - (1) Four (4) cold cleaners, collectively identified as Wash1, consisting of the following:
 - (i) One (1) cabinet washer,
 - (ii) One (1) parts washer,
 - (iii) One (1) dip tank, and
 - (iv) One (1) dip tank.
 - (2) One (1) soak washer, identified as Wash2.
- (k) Three (3) cold solvent washers, collectively identified as Wash4, containing aqueous solution, approved in 2018 for construction, no control and exhausting to atmosphere consisting of the following:
 - (1) One (1) wash cabinet,
 - (2) One (1) Lathum wash tank, and
 - (3) One (1) vibratory tumbler.

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M103-40669-00056, 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, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

- (b) 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.
- (c) 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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M103-40669-00056 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

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

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

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

C.12 Response to Excursions or Exceedances

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

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

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

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

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Ten (10) natural gas fired furnaces, identified as SpaceHeat 1 to 10, approved in 2018 for construction, each with a maximum heat input capacity of 0.4 MMBtu per hour, no control and exhausting to stacks SV05 to SV14.
- (b) One (1) natural gas fired oven, identified as Guspro Oven, approved in 2018 for construction, with a maximum heat input capacity of 10 MMBtu per hour, no control and exhausting to stack SV15.
- (c) Two (2) propane combusting turbo test cells, identified as Turbo Test 1 and 2, approved in 2018 for construction, each with a maximum heat input capacity of 12.34 MMBtu per hour, no control and exhausting to stack SV01 and SV02.
- (d) Two (2) natural gas fired washers, collectively identified as Wash3, approved in 2018 for construction, each with a maximum heat input capacity of 2 MMBtu per hour, no control and exhausting to stack SV03 and SV04.
- (e) One (1) cold solvent magnetic testing unit, identified as Mag Test, approved in 2018 for construction, with a maximum capacity of 50 gallons per year, using no control and exhausting to atmosphere.
- (f) Ten (10) abrasive blasting units, collectively identified as Blast, approved in 2018 for construction, each with a maximum throughput of 100,000 pounds per hour of steel shot, using ten (10) baghouses as control, and exhausting to atmosphere and consisting of the following:
 - (1) One (1) steel shot blaster, identified as B66.
 - (2) One (1) steel shot blaster, identified as 2101.
 - (3) Two (2) steel shot blasters, identified as em57621 and em56897.
 - (4) Three (3) ceramic bead blasters, identified as G34, E125 and E126.
 - (5) Three (3) empire glass bead blasters, identified as 2196, 2103, 2104.
- (g) One (1) surface coating operation, identified as Paint, approved in 2018 for construction, with a maximum capacity of 0.06 gallons per hour, coating turbo housings, using dry filter as control, and exhausting to stack SV16.
- (h) One (1) welding and cutting operation, identified as Weld, approved in 2018 for construction, with a maximum electrode consumption of 2.1 pound per hour, using no control, and exhausting to atmosphere, and consisting of:
 - (1) Fifteen (15) welding stations for welding steel (not stainless steel).
 - (2) Portable plasma cutters.
- (i) One (1) Machining operation, identified as MachOp, approved in 2018 for construction, using aqueous based cutting coolant and no control, and exhausting to atmosphere.

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

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

D.1.1 PM PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The PM emissions after control from each of the ten (10) abrasive media blasting units, collectively identified as Blast, shall not exceed 4 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(3), particulate from each of the ten (10) abrasive blasting units, identified as Blast, shall not exceed 8.57 pounds per hour, when operating at a process weight rate of 3.00 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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

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

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

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

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

D.1.4 Particulate Matter (PM)

In order to comply with Conditions D.1.1, and D.1.2, the baghouses for particulate control shall be in operation and control emissions from each of the ten (10) abrasive blasting units, collectively identified as Blast, at all times when the ten (10) abrasive blasting units, collectively identified as Blast is in operation.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of stack exhausts from each of the ten (10) abrasive blasting units collectively identified as Blast, shall be performed 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 a 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. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a log of daily visible emission notations of stack exhausts from each of the ten (10) abrasive blasting units, collectively identified as Blast. 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, (i.e. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the reports required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (j) Five (5) cold solvent washers, approved in 2018 for construction, with a maximum capacity of 910 gallons per year of solution, no control and exhausting to atmosphere, consisting of the following:
 - (1) Four (4) cold cleaners, collectively identified as Wash1, consisting of the following:
 - (i) One (1) cabinet washer,
 - (ii) One (1) parts washer,
 - (iii) One (1) dip tank, and
 - (iv) One (1) dip tank.
 - (2) One (1) soak washer, identified as Wash2.
- (k) Three (3) cold solvent washers, collectively identified as Wash4, containing aqueous solution, approved in 2018 for construction, no control and exhausting to atmosphere consisting of the following:
 - (1) One (1) wash cabinet,
 - (2) One (1) Lathum wash tank, and
 - (3) One (1) vibratory tumbler.

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

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

D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, the owner or operator of cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:

- (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 subdivisions (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.

D.2.2 Material Requirements for Cold Cleaner Degreaser [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning 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).

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.4 Record Keeping Requirements

- (a) To document the compliance with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaners degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record keeping Requirements contain the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Progress Rail Service Corporation
Address:	405 Life Road
City:	Peru, Indiana 46970
Phone #:	256-505-6125
MSOP #:	M103-40669-00056

I hereby certify that Progress Rail Service Corporation is:

☐ still in operation.

☐ no longer in operation.

I hereby certify that Progress Rail Service Corporation is:

☐ in compliance with the requirements of
MSOP M103-40669-00056.

☐ not in compliance with the requirements of
MSOP M103-40669-00056.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Progress Rail Service Corporation
405 Life Road
Peru, Indiana 46970

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Progress Rail Service Corporation 405 Life Road, Peru, Indiana 46970, completed construction of the stationary turbo remanufacturing facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 7, 2018 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M103-40669-00056, Plant ID No.103-00056 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____. My Commission expires:

±

Signature _____
Name _____ (typed or printed)

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

**Technical Support Document (TSD) for a New Source Construction and
Minor Source Operating Permit (MSOP)**

Source Description and Location

Source Name:	Progress Rail Service Corporation
Source Location:	405 Life Road, Peru, Indiana 46970
County:	Miami (Peru Township)
SIC Code:	3743 (Railroad Equipment)
Operation Permit No.:	M103-40669-00056
Permit Reviewer:	Madhu Preetha Murali

On September 10, 2018, the Office of Air Quality (OAQ) received an application from Progress Rail Service Corporation related to the relocation of existing emission units described in Exemption 103-20088-00040, issued on June 10, 2005, located at 588 West 7th Street, Peru, IN. The new location is 405 Life Road, Peru, Indiana 46970. The existing units being relocated at the new address and new emissions units being proposed will be considered as new emissions units.

On October 23, 2018, OAQ and Progress Rail Service Corporation had a meeting and based on this meeting, Progress Rail Service Corporation had to re-submit an application due to change in the permit level from Registration to an New Source Construction/MSOP. On November 7, 2018, OAQ received the application.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Miami County. The following attainment status designations are applicable to Miami County:

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, 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	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Miami County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Miami County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Miami County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Progress Rail Service Corporation on November 7, 2018, relating to the relocation of emission units located at 588 West 75th Street, Peru, IN 46970 and for construction and operation of additional emission units. IDEM, OAQ, has determined that the potential to emit of the source is above the MSOP threshold. Therefore, this source will be issued a MSOP at the new location and the emissions units are considered as new units.

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

- (a) Ten (10) natural gas fired furnaces, identified as SpaceHeat 1 to 10, approved in 2018 for construction, each with a maximum heat input capacity of 0.4 MMBtu per hour, no control and exhausting to stacks SV05 to SV14.
- (b) One (1) natural gas fired oven, identified as Guspro Oven, approved in 2018 for construction, with a maximum heat input capacity of 10 MMBtu per hour, no control and exhausting to stack SV15.
- (c) Two (2) propane combusting turbo test cells, identified as Turbo Test 1 and 2, approved in 2018 for construction, each with a maximum heat input capacity of 12.34 MMBtu per hour, no control and exhausting to stack SV01 and SV02.
- (d) Two (2) natural gas fired washers, collectively identified as Wash3, approved in 2018 for construction, each with a maximum heat input capacity of 2 MMBtu per hour, no control and exhausting to stack SV03 and SV04.
- (e) One (1) cold solvent magnetic testing unit, identified as Mag Test, approved in 2018 for construction, with a maximum capacity of 50 gallons per year, using no control and exhausting to atmosphere.
- (f) Ten (10) abrasive blasting units, collectively identified as Blast, approved in 2018 for construction, each with a maximum throughput of 100,000 pounds per hour of steel shot, using ten (10) baghouses as control, and exhausting to atmosphere and consisting of the following:

- (1) One (1) steel shot blaster, identified as B66.
 - (2) One (1) steel shot blaster, identified as 2101.
 - (3) Two (2) steel shot blasters, identified as em57621 and em56897.
 - (4) Three (3) ceramic bead blasters, identified as G34, E125 and E126.
 - (5) Three (3) empire glass bead blasters, identified as 2196, 2103, 2104.
- (g) One (1) surface coating operation, identified as Paint, approved in 2018 for construction, with a maximum capacity of 0.06 gallons per hour, coating turbo housings, using dry filter as control, and exhausting to stack SV16.
- (h) One (1) welding and cutting operation, identified as Weld, approved in 2018 for construction, with a maximum electrode consumption of 2.1 pound per hour, using no control, and exhausting to atmosphere, and consisting of:
- (1) Fifteen (15) welding stations for welding steel (not stainless steel).
 - (2) Portable plasma cutters.
- (i) One (1) Machining operation, identified as MachOp, approved in 2018 for construction, using aqueous based cutting coolant and no control, and exhausting to atmosphere.
- (j) Five (5) cold solvent washers, approved in 2018 for construction, with a maximum capacity of 910 gallons per year of solution, no control and exhausting to atmosphere, consisting of the following:
- (1) Four (4) cold cleaners, collectively identified as Wash1, consisting of the following:
 - (i) One (1) cabinet washer,
 - (ii) One (1) parts washer,
 - (iii) One (1) dip tank, and
 - (iv) One (1) dip tank.
 - (2) One (1) soak washer, identified as Wash2.
- (k) Three (3) cold solvent washers, collectively identified as Wash4, containing aqueous solution, approved in 2018 for construction, no control and exhausting to atmosphere consisting of the following:
- (1) One (1) wash cabinet,
 - (2) One (1) Lathum wash tank, and
 - (3) One (1) vibratory tumbler.

"Integral Part of the Process" Determination

As part of the original application, received on September 10, 2018, Progress Rail Service Corporation submitted a justification that the baghouses should be considered an integral part of the abrasive blasting units. However, the application received on November 7, 2018, the integral determination was withdrawn.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	381.43
PM ₁₀	59.64
PM _{2.5}	59.64
SO ₂	1.24
NO _x	19.65
VOC	6.38
CO	12.47
Single HAP	0.03
Total HAP	0.11

Unrestricted Potential Emissions	
HAPs	Tons/Year
Hexane	0.08
Manganese	0.02
Total	0.11

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM₁₀ and PM_{2.5} are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
furnace (SpaceHeat 1 to 10)	0.13	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03 Hexane
oven (Guspro Oven)	0.07	0.07	0.07	0.01	0.86	0.05	0.72	0.02	0.02 Hexane
turbo test cells (Turbo Test 1 and 2)	0.83	0.83	0.83	1.21	15.36	1.18	8.86	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
washers (Wash3)	0.13	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03 Hexane
cold solvent washers (Wash1 and Wash2)	-	-	-	-	-	0.18	-	-	-
cold solvent magnetic testing unit (Mag Test)	-	-	-	-	-	0.18	-	-	-
abrasive blasting units (Blast)	175.20*	53.63	53.63	-	-	-	-	-	-
surface coating operation (Paint)	1.53	1.53	1.53	-	-	1.81	-	-	-
welding and cutting operations (Weld)	3.32	3.32	3.32	-	-	-	-	0.03	0.02 Manganese
Total PTE of Entire Source	181.20	59.64	59.64	1.24	19.65	6.38	12.47	0.11	0.03 Hexane
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . * Limited to render 326 IAC 2-2 not applicable.									

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

- (1) The particulate emissions (PM) after control from each of the ten (10) abrasive blasting units, collectively identified as Blast, shall not exceed 4 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in this permit for the surface coating operation, identified as Paint, since this source does not coat large appliances. The source remanufactures turbos that are used in locomotive engines.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T, are not included in this permit, since the cold solvent washers, identified as Wash1 and Wash2 and the cold solvent magnetic testing unit, identified as Mag Test, do not use halogenated solvents.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in this permit for the surface coating operation, identified as Paint, since the source does not perform surface coating of miscellaneous metal parts and products as described in §63.3881(a).
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN (326 IAC 20-63), are not included in this permit for the surface coating operation, identified as Paint, since this source does not coat large appliances. The source remanufactures turbos that are used in locomotive engines.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit for the natural gas fired furnace, identified as SpaceHeat 1 to 10, since these units are not process heaters as defined in §63.7575.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

This new source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit PM is limited to less than 250 tons per year,
- (2) The potential to emit all other PSD regulated pollutants are less than 250 tons per year,
- (3) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it

does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

furnace

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The ten (10) natural gas fired furnace, identified as SpaceHeat 1 to 10 are not subject to the requirements of 326 IAC 6-2-1, since they are each a source of direct heating units.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The operation of each natural gas fired furnace, identified as SpaceHeat 1 to 10 at this source will emit less than 25 tons per year of a SO₂. Therefore, 326 IAC 7-1.1 does not apply to Space Heaters.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The ten (10) natural gas fired furnace, identified as SpaceHeat 1 to 10 are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the Space Heaters are less than twenty-five (25) tons per year.

oven

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The oven, identified as Guspro Oven is not subject to the requirements of 326 IAC 6-2-1, since they are a source of direct heating unit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The oven, identified as Guspro Oven is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from it is less than twenty-five (25) tons per year and ten (10) pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The oven, identified as Guspro Oven is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the Guspro Oven are less than twenty-five (25) tons per year.

washers

Pursuant to 326 IAC 8-3-1(a)(2), the washers, identified as Wash3, and cold solvent washers, identified as Wash1 and Wash2 are subject to the requirements under 326 IAC 8-3-2 since, the solvent contains VOC for use in cold cleaner degreaser.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

326 IAC 8-3-8 applies to any person who sells, offers for sale, uses, or manufactures solvent for use in cold cleaner degreasers before January 1, 2015, in Clark, Floyd, lake or Porter Counties or on and after January 1, 2015, anywhere in the state. Therefore, the washers, identified as Wash3, and cold solvent washers, identified as Wash1 and Wash2 are subject to the requirements of 326 IAC 8-3-8.

abrasive blasting units

326 IAC 6-3-2 (Particulate Emission Limitations ; Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2(e)(3), particulate from each of the ten (10) abrasive blasting units, identified as Blast, shall not exceed 8.57 pounds per hour, when operating at a process weight rate of 3.00 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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

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

surface coating operation

326 IAC 6-3-2 (Particulate Emission Limitations ; Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-1(b)(15), the surface coating operation, identified as Paint is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). The surface coating operation utilizes less than five (5) gallons of coating per day.

326 IAC 8-2-9 (Surface Coating Emission Limitations)

This source does not have the potential to emit of VOC greater than 15 pounds per day, therefore, the surface coating operation, identified as Paint are not subject to 326 IAC 8-2-9. However, any change or modification to the surface coating operation, identified as Paint, which would increase actual VOC emissions from either operation to greater than 15 pounds per day requires prior approval from IDEM, OAQ.

welding and cutting operations

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9), the fifteen (15) welding and cutting operations, identified as Weld, consume less than 625 pounds of weld wire or rod per day, total. Therefore, the requirements of 326 IAC 6-3-1 are not applicable.

machining operation

The one (1) machining operation, identified as MachOp, is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14), because these operations have potential emissions less than five-hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
Baghouse	Pressure Drop	Once per day

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 7, 2018.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M103-40669-00056. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Madhu Preetha Murali, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-9064 or (800) 451-6027, and ask for Madhu Preetha Murali or (317) 232-9064.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

unlimited Potential to Emit (tons/yr)										
Emission Unit	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Single HAP	
furnace (SpaceHeat 1 to 10)	0.13	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
oven (Guspro Oven)	0.07	0.07	0.07	0.01	0.86	0.05	0.72	0.02	0.02	Hexane
turbo test cells (Turbo Test 1 and 2)	0.83	0.83	0.83	1.21	15.36	1.18	8.86	-	-	-
washers (Wash3)	0.13	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
cold solvent washers (Wash1 and Wash2)	-	-	-	-	-	2.98	-	0.00	-	-
cold solvent magnetic testing unit (Mag Test)	-	-	-	-	-	0.18	-	-	-	-
abrasive blasting units (Blast)	375.43	53.63	53.63	-	-	-	-	-	-	-
surface coating operation (Paint)	1.53	1.53	1.53	-	-	1.81	-	-	-	-
welding and cutting operations (Weld)	3.32	3.32	3.32	-	-	-	-	0.03	0.02	Manganese
Total	381.43	59.64	59.64	1.24	19.65	6.38	12.47	0.11	0.03	Hexane

limited Potential to Emit (tons/yr)										
Emission Unit	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Single HAP	
furnace (SpaceHeat 1 to 10)	0.13	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
oven (Guspro Oven)	0.07	0.07	0.07	0.01	0.86	0.05	0.72	0.02	0.02	Hexane
turbo test cells (Turbo Test 1 and 2)	0.83	0.83	0.83	1.21	15.36	1.18	8.86	-	-	-
washers (Wash3)	0.13	0.13	0.13	0.01	1.72	0.09	1.44	0.03	0.03	Hexane
cold solvent washers (Wash1 and Wash2)	-	-	-	-	-	2.98	-	0.00	-	-
cold solvent magnetic testing unit (Mag Test)	-	-	-	-	-	0.18	-	-	-	-
abrasive blasting units (Blast)*	175.20	53.63	53.63	-	-	-	-	-	-	-
surface coating operation (Paint)	1.53	1.53	1.53	-	-	1.81	-	-	-	-
welding and cutting operations (Weld)	3.32	3.32	3.32	-	-	-	-	0.03	0.02	Manganese
Total	181.20	59.64	59.64	1.24	19.65	6.38	12.47	0.11	0.03	Hexane

* Limited to render 326 IAC 2-2 (PSD) not applicable

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Space Heaters (SpaceHeat)

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

furnace (SpaceHeat 1 to 10)

Maximum Heat Input Rate per Unit 0.4 MMBtu/hr
 Total Units 10 Units
 Total Heat Input Capacity 4 MMBtu/hr

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
4.0	1020	34.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC
	7.6	7.6	7.6	0.6	100	5.5
					**see below	
Potential Emission in tons/yr	0.13	0.13	0.13	0.01	1.72	0.09
						84
						1.44

*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 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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.6E-05	2.1E-05	1.3E-03	0.03	5.8E-05	0.03

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05	9.4E-05
Methodology is the same as above.					Total HAPs	0.03
The five highest organic and metal HAPs emission factors are provided above.					Worst HAP	0.03
Additional HAPs emission factors are available in AP-42, Chapter 1.4.						

Appendix A: Emissions Calculations
LPG-Propane - Industrial Boilers
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

turbo test cells (Turbo Test 1 and 2)

Maximum Heat Input Rate Per Unit	12.34 MMBtu/hr
Total Units	2 Units
Total Heat Input	24.68 MMBtu/hr

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO ₂ Emission factor = 0.10 x S	
24.68	2362.8	S = Sulfur Content =	0.00 grains/100ft ³

	Pollutant						
	PM*	PM10*	direct PM2.5**	SO ₂ ***	NO _x	VOC	CO
Emission Factor in lb/kgal	0.7	0.7	0.7	1.0 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.83	0.83	0.83	1.21	15.36	1.18	8.86

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

***The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

***SO₂ Emission Factor if from 40 CFR 79.55

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Propane Emission Factors shown. Please see AP-42 for butane.

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

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

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

washers (Wash3)

Maximum Heat Input Rate Per Unit 2 MMBtu/hr
 Total Units 2 Units
 Total Heat Input 4 MMBtu/hr

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
4.0	1020	34.4

	Pollutant					
Emission Factor in lb/MMCF	PM* 7.6	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5 CO 84
Potential Emission in tons/yr	0.13	0.13	0.13	0.01	1.72	0.09 1.44

*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 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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.6E-05	2.1E-05	1.3E-03	0.03	5.8E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.6E-06	1.9E-05	2.4E-05	6.5E-06	3.6E-05
					Total HAPs
					0.03
					Worst HAP
					0.03

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.

Appendix A: Emissions Calculations

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

cold solvent washers (Wash1 and Wash2)

Number of units emitting VOCs: 5
 Maximum Total Solvent Usage: 910 gal/yr
 Solvent Density: 6.54 lb/gal
 VOC Content: 100 %
 HAP Content: 0 %

	Pollutants (tons/yr)	
	VOCs	Total HAPs
Emissions Rates	2.9757	0
Total	2.9757	0

Note:

Emission Data obtained from manufacturer SDS.

Methodology:

VOCs Emission = Maximum Total Solvent Usage (gal/yr) * Solvent Density (lb/gal) * 1/2000(ton/lb)

Appendix A: Emissions Calculations

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

cold solvent magnetic testing unit (Mag Test)

Maximum Solvent Usage: 50 gal/yr
 Solvent Density: 7 lb/gal
 Number of Units: 1
 VOC Content: 100 %
 HAP Content: 0 %

	Pollutants (tons/yr)	
	VOCs	Total HAPs
Emissions Rates	0.175	0
Total	0.175	0

Note:

Emission Data obtained from manufacturer SDS.

Methodology:

VOCs Emission = Maximum Total Solvent Usage (gal/yr) * Solvent Density (lb/gal) * 1/2000(ton/lb)

**Appendix A: Emissions Calculations
Abrasive Blasting Units (Blast)**

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

abrasive blasting units (Blast)

Number of Units 10 Units
Maximum Grain Loading 0.005 gr/scf
Maximum Flow Rate 2000 acfm/min

	PM	PM10/PM2.5	PM	PM10/PM2.5	PM	PM10/PM2.5
	(lb/hr)		(lb/day)		(ton/yr)	
unlimited emissions for 1 unit	8.57	1.22	205.71	29.39	37.54	5.36
unlimited emissions for 10 units	85.71	12.24	2057.14	293.88	375.43	53.63
limited emissions for 1 unit	4.00	-		-	17.52	-
limited emissions for 10 units	40				175.20	

Note:

Conservatively assuming all the PM10 emissions equal PM2.5
PM control efficiency = 0.99 as provided by source
PM10 control efficiency = 0.93 as provided by source

Methodology:

PM unlimited emissions (lb/hr) = Maximum Grain Loading (gr/scf)* Maximum Flow Rate (acfm/min)* 60 (min/hr)* 1/7000(lb/gr)*Number of Units / (1-0.99)
PM10/P M2.5 unlimited emissions (lb/hr) = Maximum Grain Loading (gr/scf)* Maximum Flow Rate (acfm/min)* 60 (min/hr)* 1/7000(lb/gr)*Number of Units / (1-0.93)
PM/P M10/P M2.5 unlimited emissions (lb/day) = PM/P M10/P M2.5 Emissions (lb/hr)* 24
PM/P M10/P M2.5 unlimited emissions (ton/yr) = PM/P M10/P M2.5 Emissions (lb/day)*(1/2000)(ton/lb)*365(days/yr)

Appendix A: Emissions Calculations

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

surface coating operation (Paint)

Material	Density (lb/gal)	Gallons Material(gal/unit)	Maximum Usage (Unit/hr)	VOC (gal/hr)	Density VOC (lb/gal)	Potential VOC (tpy)	Weight Volatiles (%)	Transfer Efficiency (%)	PM Potential (tpy)
Suede Gray- 6910779 HF	11.26	0.50	0.13	0.06	3.16	0.87	28.00	65.00	0.78
Satin (CAB) Beige- 40107201	11.34	0.50	0.13	0.06	3.46	0.95	31.00	65.00	0.75
Total						1.81			1.53

Notes:

Emission data are from manufacturer SDS

Conservatively assuming all the PM emissions equal PM10 and PM2.5

Methodology

VOC (gal/hr)= Gallons Material (gal/unit)* Maximum Usage (Unit/hr)

Potential VOC (tpy)= VOC (gal/hr)* Density VOC (lb/gal)*1 ton/2000 lb*(8760hrs/1 yr)

PM Potential (tpy) = Maximum Usage (units/hour) * Gallons Material (gal/unit) * Density (lb/gal) * (1-Weight Volatiles%) * (1-Transfer efficiency%) *(8760 hrs/yr) *(1 ton/2000 lbs)

Appendix A: Emissions Calculations

Company Name: Progress Rail Service Corporation
Source Address: 405 Life Road, Peru, Indiana 46970
Permit Number: M103-40669-00056
Reviewer: Madhu Preetha Murali

welding and cutting operations (Weld)

Process	Number of Stations	Maximum Electrode Consumption (lb/hr)	Emission Factors (lb pollutant/lb electrode)			Potential Emissions (lb/hr)			Potential Emissions (tpy)		
			PM/PM10/PM2.5	Mn	Cr	PM/PM10/PM2.5	Mn	Cr	PM/PM10/PM2.5	Mn	Cr
MIG/TIG and portable Plasma cutter	15	2.1	0.0241	0.000034	0.00001	0.759	4.69E-03	1.38E-03	3.32442	0.020542	0.006044

Total HAP (tpy) 0.026587

Note:

Emission factors are from AP-42, Chapter 12.19, SCC 3-09-050 (January 1995), and are default values for carbon steel unless a specific electrode type is noted in the Process column.

Methodology:

Potential Emissions (tpy)= Potential Emissions (lb/hr)*(1 ton/ 2000 lb)*(8760 hr/yr)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 3, 2018

William Doak
Progress Rail Service Corporation
588 W 7th St
Peru, IN 46970

Re: Public Notice
Progress Rail Service Corporation
Permit Level: MSOP New Source Construction

(Minor PSD/EO) (120)

Permit Number: 103-40669-00056

Dear William Doak:

Enclosed is a copy of your draft MSOP New Source Construction (Minor PSD/EO) (120), Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Peru Tribune in Peru, Indiana publish the abbreviated version of the public notice no later than December 11, 2018. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Peru Public Library, 102 East Main in Peru IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Madhu Preetha Murali, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-9064 or dial (317) 232-9064.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017



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Governor

Bruno Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 3, 2018

Peru Tribune
Attn: Legals Clerk
PO Box 87
Peru, Indiana 46970

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Progress Rail Service Corporation, Miami County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than December 11, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: MSOP New Source Construction (Minor PSD/EO) (120)
Permit Number: 103-40669-00056

Enclosure

PN Newspaper.dot 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 3, 2018

To: Peru Public Library 102 East Main Peru IN

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Progress Rail Service Corporation
Permit Number: 103-40669-00056

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

December 3, 2018
Progress Rail Service Corporation
103-40669-00056

Dear Concerned Citizen(s):

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


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

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

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 1/9/2017

Mail Code 61-53

IDEM Staff	LPOGOST 12/3/2018 Progress Rail Service Corporation 103-40669-00056 (draft)			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	Handling 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		William Doak Progress Rail Service Corporation 588 W 7th St Peru IN 46970 (Source CAATS)										
2		Sean McGowan General Manager Progress Rail Service Corporation 588 W 7th St Peru IN 46970 (RO CAATS)										
3		Miami County Board of Commissioners Miami County Courthouse Peru IN 46970 (Local Official)										
4		Peru City Council and Mayors Office 35 S. Broadway Peru IN 46970 (Local Official)										
5		Miami County Health Department 25 Court Street, Ste. 211 Peru IN 46970 (Health Department)										
6		Peru Public Library 102 East Main Peru IN 46970-2300 (Library)										
7		Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 (Affected Party)										
8		Ameritech Services, Inc. One Bell Center, Rm 36-M-01 St. Louis MO 63101 (Affected Party)										
9		Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 (Affected Party)										
10												
11												
12												
13												
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