

035-44165-00089

June 7, 2021

AI ID: 631

21-454869

**Office of Air Quality - Permits Branch**

Indiana Department of Environmental Management  
Air Permits Administration  
100 N. Senate Avenue MC 61-53, IGCN 1003  
Indianapolis, IN 46204-2251

**RE: ADMINISTRATIVE AMMENDMENT  
ADDITION OF CNC ROUTER AND BAGHOUSE FOR WOODWORKING OPERATIONS  
PROGRESS RAIL MANUFACTURING CORPORATION  
LOCOMOTIVE RAILCAR MANUFACTURING FACILITY – MUNCIE, INDIANA**

To Permits Branch:

On behalf of Progress Rail Manufacturing Corporation (Progress Rail), Golder Associates Inc. (Golder) respectfully submits the attached air permit application (Appendix A) to add a computer numerical control (CNC) router with attached baghouse at the Progress Rail Muncie locomotive manufacturing facility (Facility), located at 3500 South Cowan Road in Muncie, Delaware County, Indiana. The Facility currently operates under air Permit No. 035-41588-00089 issued on June 5, 2020. Details for the requested changes are provided below.

**Air Permit History**

This Facility was originally permitted under a Federally Enforceable State Operating Permit (FESOP) 035-29929-00089 issued on 4/19/2011. The following modifications have been completed:

FESOP Permit 035-30858 was issued on 9/23/2011 to incorporate an administrative amendment to modify the list of insignificant natural gas fired equipment identified under ID NG02.

FESOP Permit 035-32216-00089 was issued on 12/5/2012 to incorporate a significant amendment to permit operation of the shotblaster (SB-01).

FESOP Permit 035-35165-00089 was issued on 3/5/2015 to transition the Facility to a Title V Permit (this is the amendment to the FESOP, and then an initial Title V Permit is issued).

Title V Permit 035-35218-00089 was issued on 3/26/2015 as the initial Title V permit due to the last amendment of the FESOP which required the Facility to transition to a Title V Permit. This permit authorized numerous emission units associated with the electric traction motor refurbishing line as well as changes to the VOC limit applicable to paint booths.

Title V Permit 035-39667-00089 was issued on 8/24/2018 to incorporate a significant amendment and incorporated into the action described below.

Title V Permit 035-39851-00089 was issued on 9/12/2018 to incorporate a significant amendment for the following items: modify PB-02, modify PB-08, add a second stack to VPI-1, update list of welding stations, add one diesel engine (ENGINE-1), and add/modify several insignificant/trivial activities.

Title V Permit 035-41588-00089 was issued on 6/5/2020 to renew the previous operating permit, as well as to remove two emissions units and add three new insignificant emissions units.

### New Emission Units (Insignificant Unit)

Progress Rail is seeking an administrative amendment to add a CNC router and dust collector to cut wooden manufacturing templates to be used during the locomotive manufacturing process. Title 326 IAC 2-7-11(a)(8)(B) allows for an insignificant activity to be incorporated into a Part 70 permit through the administrative amendment process. Woodworking operations are listed as an insignificant activity under 326 IAC 2-7-1(21)(J)(xxiii)(FF) and 326 IAC 2-7-1(21)(J)(xxix). The language of the rule states:

- (xxiii) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including the following:
  - (FF) Woodworking Operations

The baghouse that will be installed with the CNC Router will be a JET® DC-1100VX-BK baghouse dust collector. The baghouse will have a maximum design air flow rate of 1,100 actual cubic feet per minute (acfm) and a rated efficiency of 96 percent for particles sized 30 micrometers and larger (see attached brochure and user's manual). The manufacturer does not provide a grain loading guarantee, but the advertised removal efficiency will meet the 0.03 grains per actual cubic foot (gr/acf) requirement. Using the maximum allowable grain loading and the flow rate described above, the maximum potential hourly and annual emissions are shown below:

Hourly Emissions:  $0.03 \text{ gr/acf} \times 1 \text{ lb/7,000 gr} \times 1,100 \text{ acf/min} \times 60 \text{ min/hr} = 0.28 \text{ lb/hr}$

Annual Emissions:  $0.28 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 1.24 \text{ TPY}$

Based on the potential emissions above, this CNC router and integral dust collector would also be exempt from permitting under 326 IAC 2-1.1-3(e)(1)(A) as direct PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions are less than five (5) TPY. Please contact Golder at (352) 336-5600 or [pcobb@golder.com](mailto:pcobb@golder.com) if you have any questions regarding the submittal or require additional information.

Sincerely,

**Golder Associates Inc.**



Philip D. Cobb, Ph.D., P.E. (Florida)  
*Senior Project Engineer*



Ryan Birkenholz, P.E.  
*Associate & Senior Consultant*

PDC

Attachments: Appendix A – IDEM Application Forms  
Appendix B – Baghouse Brochure and User's Manual

[https://golderassociates.sharepoint.com/sites/142361/project files/6 deliverables/cover letter.docx](https://golderassociates.sharepoint.com/sites/142361/project%20files/6%20deliverables/cover%20letter.docx)

**APPENDIX A**

**IDEM Application Forms**



# AIR PERMIT APPLICATION COVER SHEET

State Form 50639 (R4 / 1-10)  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM- Office of Air Quality - Permits Branch  
100 N. Senate Avenue, MC 61-53 Room 1003  
Indianapolis, IN 46204-2251  
Telephone: (317) 233-0178 or  
Toll Free: 1-800-451-6027 x30178 (within Indiana)  
Facsimile Number: (317) 232-6749  
[www.in.gov/idem](http://www.in.gov/idem)

## NOTES:

The purpose of this cover sheet is to obtain the core information needed to process the air permit application. This cover sheet is required for all air permit applications submitted to IDEM, OAQ. Place this cover sheet on top of all subsequent forms and attachments that encompass your air permit application packet.

Submit the completed air permit application packet, including all forms and attachments, to **IDEM Air Permits Administration** using the address in the upper right hand corner of this page.

IDEM will send a bill to collect the filing fee and any other applicable fees.

Detailed instructions for this form are available on the Air Permit Application Forms website.

## FOR OFFICE USE ONLY

### PERMIT NUMBER:

035-44165-00089

### DATE APPLICATION WAS RECEIVED:

Received by State of Indiana IDEM-OAQ  
via email June 7, 2021 MJ-1

1. Tax ID Number:

## PART A: Purpose of Application

Part A identifies the purpose of this air permit application. For the purposes of this form, the term "source" refers to the plant site as a whole and NOT to individual emissions units.

2. Source / Company Name: Progress Rail Manufacturing Corporation

3. Plant ID: 035 - 2992

4. Billing Address: 3500 S. Cowan Road

City: Muncie

State: IN

ZIP Code: 47302 -

5. Permit Level: ☐ Exemption ☐ Registration ☐ SSOA ☐ MSOP ☐ FESOP ☒ TVOP ☐ PBR

6. Application Summary: Check all that apply. Multiple permit numbers may be assigned as needed based on the choices selected below.

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Initial Permit   | <input type="checkbox"/> Renewal of Operating Permit        | <input type="checkbox"/> Asphalt General Permit            |
| <input type="checkbox"/> Review Request   | <input type="checkbox"/> Revocation of Operating Permit     | <input type="checkbox"/> Alternate Emission Factor Request |
| <input type="checkbox"/> Interim Approval | <input type="checkbox"/> Relocation of Portable Source      | <input type="checkbox"/> Acid Deposition (Phase II)        |
| <input type="checkbox"/> Site Closure     | <input type="checkbox"/> Emission Reduction Credit Registry |  |

☐ Transition (between permit levels)

From:

To:

- ☒ Administrative Amendment:
- |  |   |
|--|---|
| <input type="checkbox"/> Company Name Change   | <input type="checkbox"/> Change of Responsible Official |
| <input type="checkbox"/> Correction to Non-Technical Information   | <input type="checkbox"/> Notice Only Change             |
| <input checked="" type="checkbox"/> Other (specify): Incorporate an exempt unit as described in 326 IAC 2-1.2-3 (woodworking operations as defined by 326 IAC 2-9-4) |   |

- ☐ Modification:
- |  |  |  |
|--|--|--|
| <input type="checkbox"/> New Emission Unit or Control Device     | <input type="checkbox"/> Modified Emission Unit or Control Device        |  |
| <input type="checkbox"/> New Applicable Permit Requirement       | <input type="checkbox"/> Change to Applicability of a Permit Requirement |  |
| <input type="checkbox"/> Prevention of Significant Deterioration | <input type="checkbox"/> Emission Offset                                 | <input type="checkbox"/> MACT Preconstruction Review |
| <input type="checkbox"/> Minor Source Modification               | <input type="checkbox"/> Significant Source Modification                 |  |
| <input type="checkbox"/> Minor Permit Modification               | <input type="checkbox"/> Significant Permit Modification                 |  |
| <input type="checkbox"/> Other (specify):                        |  |  |

7. Is this an application for an initial construction and/or operating permit for a "Greenfield" Source? ☐ Yes ☒ No

8. Is this an application for construction of a new emissions unit at an Existing Source? ☒ Yes ☐ No



### PART B: Pre-Application Meeting

Part B specifies whether a meeting was held or is being requested to discuss the permit application.

9. Was a meeting held between the company and IDEM prior to submitting this application to discuss the details of the project?

☒ No ☐ Yes: *Date:*

10. Would you like to schedule a meeting with IDEM management and your permit writer to discuss the details of this project?

☒ No ☐ Yes: *Proposed Date for Meeting:*

### PART C: Confidential Business Information

Part C identifies permit applications that require special care to ensure that confidential business information is kept separate from the public file.

Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in the Indiana Administrative Code (IAC). To ensure that your information remains confidential, refer to the IDEM, OAQ information regarding submittal of confidential business information. For more information on confidentiality for certain types of business information, please review IDEM's Nonrule Policy Document Air-031-NPD regarding Emission Data.

11. Is any of the information contained within this application being claimed as **Confidential Business Information**?

☒ No ☐ Yes

### PART D: Certification Of Truth, Accuracy, and Completeness

Part D is the official certification that the information contained within the air permit application packet is truthful, accurate, and complete. Any air permit application packet that we receive without a signed certification will be deemed incomplete and may result in denial of the permit.

For a Part 70 Operating Permit (TVOP) or a Source Specific Operating Agreement (SSOA), a "responsible official" as defined in 326 IAC 2-7-1(34) must certify the air permit application. For all other applicants, this person is an "authorized Individual" as defined in 326 IAC 2-1.1-1(1).

☒ I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Brian Roedel  
Name (typed)

Director, Locomotive Production  
Title

Signature

Date

5.28.21

**OAQ GENERAL SOURCE DATA APPLICATION****GSD-01: Basic Source Level Information**

State Form 50640 (R5 / 1-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Received by State of Indiana IDEM-OAQ  
via email June 7, 2021 MJ-1**IDEM – Office of Air Quality – Permits Branch**  
100 N. Senate Avenue, MC 61-53 Room 1003  
Indianapolis, IN 46204-2251  
Telephone: (317) 233-0178 or  
Toll Free: 1-800-451-6027 x30178 (within Indiana)  
Facsimile Number: (317) 232-6749  
[www.IN.gov/ideem](http://www.IN.gov/ideem)**NOTES:**

The purpose of GSD-01 is to provide essential information about the entire source of air pollutant emissions. GSD01 is a required form.

Detailed instructions for this form are available on the Air Permit Application Forms website.

All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 826 IAC 17.1-4-1. Failure to follow these requirements exactly will result in your information becoming a public record, available for public inspection.

035-44165-00089

**PART A: Source / Company Location Information**

1. Source / Company Name: Progress Rail Manufacturing Corporation		2. Plant ID: 035 – 2992	
3. Location Address: 3500 S. Cowan Road			
City: Muncie		State: IN	ZIP Code: 47302 –
4. County Name: Delaware		5. Township Name: Center	
6. Geographic Coordinates: Latitude: 40° 9' 39.59" N		Longitude: 85° 24' 8.01" W	
7. Universal Transverse Mercator Coordinates (if known): Zone: 16N      Horizontal: 636131      Vertical: 4446927			
8. Adjacent States: Is the source located within 50 miles of an adjacent state? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – Indicate Adjacent State(s): <input type="checkbox"/> Illinois (IL) <input type="checkbox"/> Michigan (MI) <input checked="" type="checkbox"/> Ohio (OH) <input type="checkbox"/> Kentucky (KY)			
9. Attainment Area Designation: Is the source located within a non-attainment area for any of the criteria air pollutants? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – Indicate Nonattainment Pollutant(s): <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> O <sub>3</sub> <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> SO <sub>2</sub>			
10. Portable / Stationary: Is this a portable or stationary source? <input type="checkbox"/> Portable <input checked="" type="checkbox"/> Stationary			

**PART B: Source Summary**

11. Company Internet Address (optional): <a href="http://www.progressrail.com">www.progressrail.com</a>	
12. Company Name History: Has this source operated under any other name(s)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – Provide information regarding past company names in Part I, Company Name History.	
13. Portable Source Location History: Will the location of the portable source be changing in the near future? <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> No <input type="checkbox"/> Yes – Complete Part J, Portable Source Location History, and Part K, Request to Change Location of Portable Source.	
14. Existing Approvals: Have any exemptions, registrations, or permits been issued to this source? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – List these permits and their corresponding emissions units in Part M, Existing Approvals.	
15. Unpermitted Emissions Units: Does this source have any unpermitted emissions units? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes – List all unpermitted emissions units in Part N, Unpermitted Emissions Units.	
16. New Source Review: Is this source proposing to construct or modify any emissions units? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes – List all proposed new construction in Part O, New or Modified Emissions Units.	
17. Risk Management Plan: Has this source submitted a Risk Management Plan? <input checked="" type="checkbox"/> Not Required <input type="checkbox"/> No <input type="checkbox"/> Yes    Date submitted:      EPA Facility Identifier:    –    –	



### PART C: Source Contact Information

**IDEM will send the original, signed permit decision to the person identified in this section.**  
This person **MUST** be an employee of the permitted source.

18. Name of Source Contact Person: Tyson Long

19. Title (optional): Environmental Manager

20. Mailing Address: 3500 S. Cowan Road

City: Muncie

State: IN

ZIP Code: 47302 –

21. Electronic Mail Address (optional): tlong@progressrail.com

22. Telephone Number: ( 765 ) 281 – 2706

23. Facsimile Number (optional): ( ) –

### PART D: Authorized Individual/Responsible Official Information

IDEM will send a copy of the permit decision to the person indicated in this section, if the Authorized Individual or Responsible Official is different from the Source Contact specified in Part C.

24. Name of Authorized Individual or Responsible Official: Brian Roedel

25. Title: Director, Locomotive Production

26. Mailing Address: 3500 S. Cowan Road

City: Muncie

State: IN

ZIP Code: 47302 –

27. Telephone Number: ( 708 ) 368 – 3552

28. Facsimile Number (optional): ( ) –

29. Request to Change the Authorized Individual or Responsible Official: Is the source officially requesting to change the person designated as the Authorized Individual or Responsible Official in the official documents issued by IDEM, OAQ? The permit may list the title of the Authorized Individual or Responsible Official in lieu of a specific name.

☒ No

☐ Yes – Change Responsible Official to:

### PART E: Owner Information

30. Company Name of Owner: Progress Rail Manufacturing Corporation

31. Name of Owner Contact Person: Same as Part D

32. Mailing Address: Same as Part D

City:

State:

ZIP Code: –

33. Telephone Number: ( ) –

34. Facsimile Number (optional): ( ) –

34. Operator: Does the "Owner" company also operate the source to which this application applies?

☐ No – Proceed to Part F below.

☒ Yes – Enter "SAME AS OWNER" on line 35 and proceed to Part G below.

### PART F: Operator Information

35. Company Name of Operator: SAME AS OWNER

36. Name of Operator Contact Person:

37. Mailing Address:

City:

State:

ZIP Code: –

38. Telephone Number: ( ) –

39. Facsimile Number (optional): ( ) –



### PART G: Agent Information

40. Company Name of Agent: Golder Associates Inc

41. Type of Agent: ☒ Environmental Consultant ☐ Attorney ☐ Other (specify):

42. Name of Agent Contact Person: Philip Cobb

43. Mailing Address: 6026 NW 1<sup>st</sup> Place

City: Gainesville

State: FL

ZIP Code: 32607 –

44. Electronic Mail Address (optional): pcobb@golder.com

45. Telephone Number: ( 352 ) 336 – 5600

46. Facsimile Number (optional): ( 352 ) 336 – 6603

47. Request for Follow-up: Does the "Agent" wish to receive a copy of the preliminary findings during the public notice period (if applicable) and a copy of the final determination? ☐ No ☒ Yes

### PART H: Local Library Information

48. Date application packet was filed with the local library: Not Applicable

49. Name of Library:

50. Name of Librarian (optional):

51. Mailing Address:

City:

State:

ZIP Code: –

52. Internet Address (optional):

53. Electronic Mail Address (optional):

54. Telephone Number: ( ) –

55. Facsimile Number (optional): ( ) –

### PART I: Company Name History (if applicable)

Complete this section only if the source has previously operated under a legal name that is different from the name listed above in Section A.

56. Legal Name of Company

57. Dates of Use

Not Applicable

to

to

to

to

to

to

to

to

to

to

58. Company Name Change Request: Is the source officially requesting to change the legal name that will be printed on all official documents issued by IDEM, OAQ?

☒ No

☐ Yes – Change Company Name to:

Complete this section only if the source is portable and the location has changed since the previous permit was issued. The current location of the source should be listed in Section A.

[illegible]

Complete this section to request a change of location for a portable source.

<b>62. Current Location:</b>		
Address: Not Applicable		
City:	State:	ZIP Code: –
County Name:		
<b>63. New Location:</b>		
Address: Not Applicable		
City:	State:	ZIP Code: –
County Name:		

### PART L: Source Process Description

Complete this section to summarize the main processes at the source.

64. Process Description	65. Products	66. SIC Code	67. NAICS Code
Locomotive Manufacturing	Locomotives	3743	336510

### PART M: Existing Approvals (if applicable)

Complete this section to summarize the approvals issued to the source since issuance of the main operating permit.

68. Permit ID	69. Emissions Unit IDs	70. Expiration Date
035-41588	Title V Renewal (issued 6/5/2020)	6/5/2025
035-39851	Title V Significant Revision (issued 9/12/2018)	3/26/2020
035-39667	Title V Significant Revision (issued 8/24/2018)	3/26/2020
035-35218	Title V Initial Permit/transition from FESOP (issued 3/26/2015)	3/26/2020
	Various FESOPs (see cover letter)	

### PART N: Unpermitted Emissions Units (if applicable)

Complete this section only if the source has emission units that are not listed in any permit issued by IDEM, OAQ.

71. Emissions Unit ID	72. Type of Emissions Unit	73. Actual Dates		
		Began Construction	Completed Construction	Began Operation
N/A	Not Applicable			

### PART O: New or Modified Emissions Units (if applicable)

Complete this section only if the source is proposing to add new emission units or modify existing emission units.

74. Emissions Unit ID	75. NEW	76. MOD	77. Type of Emissions Unit	78. Estimated Dates		
				Begin Construction	Complete Construction	Begin Operation
TBD	X		CNC Router with Baghouse	6/1/2021	8/1/2021	8/1/2021



**APPENDIX B**

**Baghouse Brochure and User Manual**



# DC-1100VX-BK DUST COLLECTOR, 1.5HP 1PH 115/230V, 30-MICRON BAG FILTER KIT

708657K

The JET® DC-1100VX features the exclusive Vortex Cone™ which improves chip separation to prevent clogging of the filter, and increases packing efficiency of the collector bag. The high air velocity (CFM) stands up to any competitive specifications, and the industrial controls are designed for years of durable use. Collection bags have an elastic band for fast installation and removal. Swivel casters offer maneuverability within the shop. Visit <http://www.vortexcone.com> for more information.

## FEATURES

- Eliminates premature filter clogging for sustained performance
- High air velocity (CFM) design stands up to any competitive specifications
- Industrial controls designed for years of trouble-free use
- Permanently lubricated, totally enclosed, fan-cooled motors are rated for continuous-duty
- Quick-connect collection bags with elastic band for fast, easy installation and removal
- Single-stage design for economical and quiet operation
- Vortex Cone improves chip separation and collector bag packing efficiency



## JET RED ASSURANCE 5-YEAR WARRANTY

JET warrants every product it sells. If one of our tools needs service or repair, one of our Authorized Service Centers located throughout the United States can give you quick service. In most cases, any of these JPW Industries Authorized Service Centers can authorize warranty repair, assist you in obtaining parts, or perform routine maintenance and major repair on your JET tools. For the name of an Authorized Service Center in your area call 1-800-274-6848.

# STAND BEHIND YOUR WORK

550+ SERVICE CENTERS NATIONWIDE | INDUSTRY-LEADING WARRANTIES | EXPERT TECHNICAL SERVICE



# DC-1100VX-BK DUST COLLECTOR, 1.5HP 1PH 115/230V, 30-MICRON BAG FILTER KIT

708657K

## SPECIFICATIONS

Air Flow @ 4" (CFM)	1100
Style (Type)	Bag
Static Pressure (Wc.)	10-1/2
Efficiency (Micron)	30
Bag Diameter (In.)	20
Collection Bag Capacity (Cu. Ft.)	5-3/10
Collection Bag Length (In.)	30
Sound Rating (Db.)	70 - 80
Impeller Material	Steel
Motor Power (HP)	1-1/2
1-Hose Connection Diameter (In.)	6
2-Hoses Connection Diameter (In.)	4
Prewired Voltage (V.)	115



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550+ SERVICE CENTERS NATIONWIDE | INDUSTRY-LEADING WARRANTIES | EXPERT TECHNICAL SERVICE





DC-1100VX-BK DUST  
COLLECTOR, 1.5HP 1PH  
115/230V, 30-MICRON BAG  
FILTER KIT

708657K

FULL SERIES

STOCK NO	MODEL NO	AIR FLOW @ 4" (CFM)	STYLE (TYPE)	VELOCITY @ 4" (FPM)	NUMBER OF AIR INLETS	EFFICIENCY (MICRON)
708658K	DC-1100VX-5M	1100	Bag	12,571		5
708657K	DC-1100VX-BK	1100	Bag			30
708659K	DC-1100VX-CK	1100	Canister	12,571		2
710701K	DC-1200VX-BK1	1200	Bag	13,745		30
710703K	DC-1200VX-BK3	1200	Bag	13,745		30
710702K	DC-1200VX-CK1	1200	Canister			2
710704K	DC-1200VX-CK3	1200	Canister	13,745		2

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