

PERMIT CONDITIONS

PERMIT NO.: OP-49-0009

COMPANY: ACF Industries, Inc.

LOCATION: Milton Borough, Northumberland County

3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by provisions of Title I of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following air contamination sources used in the manufacture of railcars:
- solvent cleanup of paint spray guns and lines and paint containers
 - solvent cleanup of stencils
 - three 10,000 gallon #2 fuel oil storage tanks, two 1,000 gallon #2 fuel oil storage tanks, one 8,000 gallon diesel fuel storage tank and one 2,000 gallon gasoline storage tank
 - miscellaneous small combustion sources (furnaces, heaters and cutting torches), as identified in Table 2-1 of ACF Industries' 7/94 RACT proposal.
4. The expiration date shown on the operating permit is for state purposes. For Federal enforcement purposes the conditions of this operating permit which pertain to the implementation of the RACT regulations shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51.4 and approved by the U.S. Environmental Protection Agency (EPA). The operating permit shall become enforceable by the U.S. EPA upon approval of the above as a revision to the SIP.
5. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all solvent used for the cleaning of paint spray guns and lines shall be flushed into an enclosed container. Under no circumstances shall volatile organic compound-containing cleaning solvent be sprayed through a spray gun into the atmosphere. All containers of volatile organic compound-containing cleaning solvents or mixtures of paint waste and cleaning solvents shall be kept closed except when material is being added to, or removed from, the containers. Under no circumstances shall volatile organic compound-containing cleaning solvents or mixtures of paint waste and cleaning solvents be disposed of via methods which promote the evaporative loss of volatile organic compounds into the atmosphere. Additionally, the volatile organic compound emissions from the cleaning of paint spray guns and lines shall not exceed 2.0 tons per year (as determined by the Department).

Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all paint containers shall be emptied of residual paint prior to being cleaned with volatile organic compound-containing cleaning solvent. If the containers are allowed to sit for more than 5 minutes after the addition of cleaning solvent and prior to emptying the paint waste and cleaning solvent mixture from the

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- containers, they shall be covered to prevent evaporative loss. When the paint waste and cleaning solvent mixture is removed from the paint containers, it shall be emptied into a container which is kept closed except when material is being added to or removed from it. Under no circumstances shall paint container cleaning practices be employed which promote the evaporative loss of volatile organic compounds into the atmosphere. Additionally, the volatile organic compound emissions from the cleaning of paint containers shall not exceed 2.0 tons per year (as determined by the Department).
6. The potential to emit volatile organic compounds from each of the following source categories shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year (as determined by the Department). Should any of these limitations ever be exceeded for any of the source categories listed below, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source contained in the respective source category.
- solvent cleanup of stencils
 - five #2 fuel oil storage tanks, one diesel fuel storage tank and one gasoline storage tank, as identified in condition 3 herein
 - miscellaneous small combustion sources, as identified in condition 3 herein
7. Pursuant to the recordkeeping requirements of Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall maintain comprehensive accurate records of the following:
- the type(s) and amount(s) of volatile organic compound-containing solvent used for the cleaning of paint spray guns and lines
 - the amount(s) of volatile organic compound-containing solvent used for the cleaning of paint spray guns and lines which is disposed of in liquid form
 - the type(s) and amount(s) of volatile organic compound-containing solvent used for the cleaning of paint containers
 - the amount(s) of volatile organic compound containing solvent used for the cleaning of paint spray guns and lines which is disposed of in liquid form.

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- the type(s) and amount(s) of volatile organic compound-containing solvent used for stencil cleaning
- the amount(s) of volatile organic compound-containing solvent used for stencil cleaning which is disposed of in liquid form
- the total combined amount of natural gas and the total combined amount of propane used per year in the miscellaneous combustion sources identified in condition 3 herein
- the total combined amount of #2 fuel oil, the amount of diesel fuel and the amount of gasoline delivered per year to the fuel oil, diesel fuel and gasoline storage tanks identified in condition 3 herein

These records shall be retained for at least 2 years and shall be submitted to the Department upon request. The company shall additionally, upon Department request, provide emission calculations in order to demonstrate compliance with the emission limitations specified in conditions 5 and 6 herein.