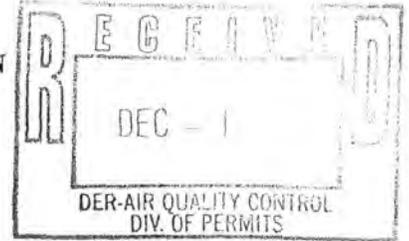


COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY



**OPERATING PERMIT**

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.:	<u>OP-49-0012</u>	Source &	<u>railcar cleaning and</u>
Owner:	<u>American Railcar Industries, Inc.</u>	Air	<u>refurbishment operation, as</u>
	<u>Shippers Car Line Division</u>	Cleaning	<u>described in condition 3</u>
Address:	<u>P.O. Box 316</u>	Device:	<u>herein</u>
	<u>Milton, PA 17847</u>		
Attn:	<u>Mr. John Henry</u>	Location:	<u>Milton Borough</u>
	<u>Environmental/Safety Coordinator</u>		<u>Northumberland County</u>

This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning device(s) are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of the applicable plan approval(s) issued;
  - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

See attached for additional conditions.

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: NOV 29 1995

  
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Environmental Program Manager

cc: Harrisburg  
File

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3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by the 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 cleaning and refurbishment of railcars:
  - an LPG pressure tank car venting/flaring operation
  - a commodity car cleaning operation
  - a solvent cleaning operation (stencil cleaning)
  - solvent cleanup of surface coating equipment
  - three storage tanks - a 24,949 gallon #2 fuel oil tank, a 2,000 gallon kerosene tank and a 300 gallon gasoline tank
  - 59 small combustion sources, as listed in Table 2-1 of Shippers' 7/94 RACT proposal
4. The expiration date shown in this permit is for state purposes. For federal enforcement purposes the conditions of this operating permit which pertain to the implementation of RACT regulations shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA). The operating permit shall become enforceable by the U.S. EPA upon its approval of the above as a revision to the SIP.
5. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, after 12/31/95 the company shall, wherever possible, use adhesive decals in place of stencil-painting for the identificational marking of railcars. Additionally, volatile organic compound emissions from the cleaning of stencils shall not thereafter exceed 1 ton per calendar year, as determined by the Department.
6. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, all pressure tank cars used for the transport of LPG or other gaseous (under normal conditions) volatile organic compounds shall be checked for residual pressure before processing. All such cars with residual pressures greater than 1 pound per square inch (gauge) shall be connected to a flare, and the residual LPG or other volatile organic compound gases flared to the maximum extent possible before the cars are opened to atmosphere. Additionally, volatile organic compound emissions from this pressure tank car flaring/venting operation shall not exceed 29.6 tons per calendar year, as determined by the Department.
7. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the volatile organic compound emissions from the commodity car cleaning operation shall not exceed 12 tons per calendar year, as determined by the Department. Additionally, no organic solvents other than #2 fuel oil or kerosene shall be used in the commodity car cleaning operation unless written Department approval is obtained for the use of a substitute or alternate solvent.

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8. 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.
- a. coating line flushing and cleanup associated with all surface coating operations
  - b. 19 small (all less than 10 million Btu/hr) natural gas / fuel oil-fired heaters and boilers, as listed in Table 2-1 of Shippers' 7/94 RACT proposal
  - c. 40 propane-fired cutting torches
  - d. three storage tanks - a 24,949 gallon #2 fuel oil tank, a 2000 gallon kerosene tank and a 300 gallon gasoline tank
9. Pursuant to the recordkeeping requirements of 25 Pa. Code 129.95, the company shall keep accurate, comprehensive records of the following:
- the type(s) and amount(s) of organic solvent used for paint line cleanup purposes
  - the type(s) and amount(s) of paint line cleanup solvent disposed of in liquid form
  - the contents of each LPG or other gaseous volatile organic compound pressure tank car cleaned, as well as the residual pressures of each, both as received and after flaring (where flaring is required),
  - the type(s) and amount(s) of organic solvent used for stencil cleaning purposes
  - the contents of each organic liquid-containing commodity car cleaned
  - the amount of kerosene used for commodity car cleaning purposes

These records shall be retained for at least two years and submitted to the Department or shown to Department personnel upon request. The company shall additionally, upon Department request, provide emission calculations (based on these records) in order to demonstrate compliance with the emission limitations contained in conditions 5,6,7 and 8 above.

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10. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits or allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
11. The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
12. This operating permit is valid for a limited period of time and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Resources. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania - Clean Air Fund". The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than November 1, 2000.

Additional annual operating permit administration fees may also be required pursuant to Section 127.703. If required, these fees are to be paid by no later than 11/30/96, 11/30/97, 11/30/98 and 11/30/99. The administration fee is to be submitted with an Annual Operating Permit Administration Fee Transmittal form.

All necessary forms can be obtained from the Department upon request.

13. Any notification required as a result of any condition herein should be directed to: Mark J. Donovan, Air Quality Specialist, 208 West Third Street, Suite 101, Williamsport, PA 17701-6448, telephone (717) 327-3705.