Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

Permitted Equipment

Emission Unit(s): Railcar Exterior Grit Blast Booth (EU1)

Control Equipment: Baghouse EC 1 and Panel Filter EC 1A (Vents Inside)

Emission Point: EP 1

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
93-A-251	92-256	Railcar Exterior Grit Blast Booth	6/22/93	No
93-A-251-S1	96-200	Change of Operating Limits	6/11/96	No
93-A-251-S2	00-142	Revise Conditions 14 and 15	4/26/00	No
93-A-251-S3	03-335	Replace Baghouse	8/18/03	No
93-A-251-S4	08-621	Now Venting Inside	10/29/09	No
93-A-251-S5	12-409	Establish $PM_{2.5}$ Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	2.50[4]	NA	0.05 gr/dscf	23.4(6)
PM_{10}	0.50[4]	NA	NA	NAAQS
$PM_{2.5}$	0.0156[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	Vents Inside
Discharge Style	NA
Stack Opening, (inches, dia.)	36"
Exhaust Temperature (°F)	90 °F
Exhaust Flowrate (scfm)	16,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	Yes[1]	No	Performance Test	One Time
$PM_{2.5}$	Yes[1]	No	Performance Test	One Time
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Testing is only required if EP 1 is vented to the atmosphere (currently permitted to vent inside).

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	9 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This emission unit is not subject to any applicable NSPS or NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. Operating limits are not required at this time.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. Operating condition monitoring is not required at this time.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code

MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

Permitted Equipment

Emission Unit(s): Railcar Interior Grit Blast Booth (South) (EU-2)

Control Equipment: Baghouse CE-2 and Panel Filters CE-2A

Emission Point: EP 2 (Vents Inside)

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
93-A-252	92-256	Railcar Interior Grit Blast Booth (South)	6/22/93	Yes
93-A-252-S1	96-200	Change of Operating Limits	6/11/96	Yes
93-A-252-S2	00-142	Revise Conditions 14 and 15	4/26/00	No
93-A-252-S3	00-144	Change Emission Point Characteristics	12/21/00	No
93-A-252-S4	08-621	Amend Emission Limit Based on Testing EP-3	10/29/09	No
93-A-252-S5	12-409	Add Particulate Filters, Vent Inside, and Establish $PM_{2.5}$ Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:
   Construction Permit Supervisor
   Air Quality Bureau
   Iowa Department of Natural Resources
   7900 Hickman Road, Suite 1
   Windsor Heights, IA 50324
   Telephone: (515) 281-8189
   Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:
   Stack Testing Coordinator
   Air Quality Bureau
   Iowa Department of Natural Resources
   7900 Hickman Road, Suite 1
   Windsor Heights, IA 50324
   Telephone: (515) 281-4899
   Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall he available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	2.50[4]	NA	0.05 gr/dscf	23.4(6)
PM_{10}	0.50[4]	NA	NA	NAAQS
$PM_{2.5}$	0.0095[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	Vents Inside
Discharge Style	NA
Stack Opening, (inches, dia.)	72" x 48"
Exhaust Temperature (°F)	68 °F
Exhaust Flowrate (scfm)	16,000

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	Yes[1]	No	Performance Test	One Time
$PM_{2.5}$	Yes[1]	No	Performance Test	One Time
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

1 Testing is only required if EP 2 is vented to the atmosphere (currently permitted to vent inside).

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hours	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	15 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must he approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation aud maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This emission unit is not subject to any applicable NSPS or NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-2A) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources

DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials.
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Grit Blast Booth (North) (EU-3)

Control Equipment: Baghouse CE-3 and Panel Filters CE-3A

Emission Point: EP 3 (Vents Inside)

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
93-A-253	92-256	Railcar Interior Grit Blast Booth (South)	6/22/93	Yes
93-A-253-S1	96-200	Change of Operating Limits	6/11/96	Yes
93-A-253-S2	00-142	Revise Conditions 14 and 15	4/26/00	No
93-A-253-S3	00-144	Change Emission Point Characteristics	12/21/00	No
93-A-253-S4	08-621	Amend Emission Limit Based on Testing EP-3	10/29/09	No
93-A-253-S5	12-409	Add Additional Particulate Filter, Vent inside building, and Establish $PM_{2.5}$ Limits	4/8/13	No

Larry Sweet

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	2.50[4]	NA	0.05 gr/dscf	23.4(6)
PM_{10}	0.50[4]	NA	NA	NAAQS
$PM_{2.5}$	0.0095[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	Vents Inside
Discharge Style	NA
Stack Opening, (inches, dia.)	96" x 72"
Exhaust Temperature (°F)	68 °F
Exhaust Flowrate (scfm)	16,000

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	Yes[1]	No	Performance Test	One Time
$PM_{2.5}$	Yes[2]	No	Performance Test	One Time
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Testing is only required if EP 2 is vented to the atmosphere (currently permitted to vent inside).
[2] $PM_{2.5}$ performance testing was successfully conducted March 19, 2012. Further testing is not warranted at this time.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	15 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This emission unit is not subject to any applicable NSPS or NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-3A) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible aud maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources

gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Vapor Removal System (EU 4)

Control Equipment: Flare (rated capacity 30.192 MMNtu/hr) (CE-4)

Emission Point: EP 4

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
93-A-254	92-256	Original Permit	6/22/93	Yes
93-A-254-S1	99-184	Flaring Rate Increased	6/11/96	Yes
93-A-254-S2	08-621	Amend PM/PM_{10} Emission Limits	4/26/00	No
93-A-254-S3	12-409	Establish $PM_{2.5}$ Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of tbe (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for tbe construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person sball construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

---

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.25[4]	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	0.250[4]	NA	NA	NAAQS
$PM_{2.5}$	0.0075[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	500 ppm	23.3(3)"e"
Nitrogen Oxides (NO_X)	NA	34.7[6]	NA	NA
Volatile Organic Compounds	NA	6.88[7]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] NO_x PTE based on combustion of NH_3 (25.71 tons/yr) and combustion of natural gas (8.99 tons/yr).
[7] VOC PTE based on 8760 hours of operation of the flare (emissions due to combustion).

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	55
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	8
Exhaust Temperature (°F)	1,300 °F
Exhaust Flowrate (scfm)	450 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

1 Testing is only required if EP 2 is vented to the atmosphere (currently permitted to vent inside).

<u>If an initial compliance demonstration specified above is testing</u>, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

<u>If subsequent testing is specified above</u>, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	2 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This emission unit is not subject to any applicable NSPS or NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. Operating limits are not required at this time.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. Operating condition monitoring is not required at this time.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units

NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Inline Tank Car Qualification Process
Welding & Metal Arc Cutting (EU 8)

Control Equipment: Mini Pleat Filters CE M1

Emission Point: EP M1

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-1086	00-144	Original Permit	8/9/94	No
00-A-1086-S1	08-621	Amend Emission Unit Identification	10/29/09	No
00-A-1086-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits, And Replace Fan To Increase Airflow From 5000 scfm to 20,000 scfm	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.8	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	0.87[4]	NA	NA	NAAQS
$PM_{2.5}$	0.033[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	27
Discharge Style	Vertical, Unobstructed
Stack Opening, (inches, dia.)	46
Exhaust Temperature (°F)	72
Exhaust Flowrate (scfm)	20,000

The temperature aud flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-M1) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

C. The control equipment must be installed and operational by July 14, 2013.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources

HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Inline Tank Car Qualification Process Welding & Metal Arc Cutting (EU 8)

Control Equipment: Mini Pleat Filters CE M2

Emission Point: EP M2

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-1087	00-144	Original Permit	8/9/94	No
00-A-1087-S1	08-621	Amend Emission Unit Identification	10/29/09	No
00-A-1087-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits, And Replace Fan To Increase Airflow From 5000 scfm to 20,000 scfm	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

---

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

---

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127.	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.8	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	0.87[4]	NA	NA	NAAQS
$PM_{2.5}$	0.033[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	27
Discharge Style	Vertical, Unobstructed
Stack Opening, (inches, dia.)	46
Exhaust Temperature (°F)	72
Exhaust Flowrate (scfm)	20,000

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	Yes[1]	No	Performance Test	One Time
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Performance test successfully completed April 4, 2012.

<u>If an initial compliance demonstration specified above is testing</u>, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

<u>If subsequent testing is specified above</u>, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-M2) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

C. The control equipment must be installed and operational by July 14, 2013.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources

HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DNR

Permitted Equipment

Emission Unit(s): Inline Tank Car Qualification Process Welding & Metal Arc Cutting (EU 8)

Control Equipment: Mini Pleat Filters CE M3

Emission Point: EP M3

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-1088	00-144	Original Permit	8/9/94	No
00-A-1088-S1	08-621	Amend Emission Unit Identification	10/29/09	No
00-A-1088-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits, And Replace Fan To Increase Airflow From 5000 scfm to 20,000 scfm	4/8/13	No

Larry Smith

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.8	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	0.87[4]	NA	NA	NAAQS
$PM_{2.5}$	0.033[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	27
Discharge Style	Vertical, Unobstructed
Stack Opening, (inches, dia.)	46
Exhaust Temperature (°F)	72
Exhaust Flowrate (scfm)	20,000

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-M3) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

C. The control equipment must be installed and operational by July 14, 2013.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources

HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter eqnal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

Permitted Equipment

Emission Unit(s): Railcar Exterior Paint Room (EU 5)

Control Equipment: Dry Filters CE 5A

Emission Point: EP 5A

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
93-A-255	92-256	Original Permit	8/4/93	Yes
93-A-255-S1	94-168	Amend Operating Limits	5/25/94	Yes
93-A-255-S2	96-200	Addition of PM Limits	6/11/96	Yes
93-A-255-S3	00-142	Revise Paint Usage Limit	3/26/00	No
93-A-255-S4	02-339	Remove Hourly Operating Condition	11/6/02	No
93-A-255-S5	08-497	Correct Operating Conditions	10/23/08	No
93-A-255-S6	08-621	Amend Operating Limits	10/29/09	No
93-A-255-S7	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.50	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.25[4]	NA	NA	NAAQS
$PM_{2.5}$	0.08[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	39
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	38
Exhaust Temperature (°F)	97 °F
Exhaust Flowrate (scfm)	9,188 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	Yes[1]	No	Performance Test	One Time
$PM_{2.5}$	Yes[2]	No	Performance Test	One Time
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Testing was completed August 20, 2009.
[2] $PM_{2.5}$ Testing was successfully conducted March 26 thru 28, 2012.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	I hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. Emission Unit 5 (EU-5) shall not exceed 20 hours of operation per day.

C. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record of all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Exterior Paint Room (EU 5)

Control Equipment: Dry Filters CE 5B

Emission Point: EP 5B

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-629	93-256	Original Permit	6/11/96	Yes
96-A-629-S1	00-142	Revise Paint-Use Limitations	4/26/00	No
96-A-629-S2	08-621	Amend Operating Limits	10/29/09	No
96-A-629-S3	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that coustruction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or uot, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.50	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.25[4]	NA	NA	NAAQS
$PM_{2.5}$	0.08[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	39
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	38
Exhaust Temperature (°F)	97 °F
Exhaust Flowrate (scfm)	9,188 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	Yes[1]	No	Performance test	One Time
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Testing was completed August 20, 2009.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. Emission Unit 5 (EU-5) shall not exceed 20 hours of operation per day.

C. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record of all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

E. For EU-5 record the numbers of hour operated each day.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

Permitted Equipment

Emission Unit(s): Railcar Exterior Paint Room (EU 5)

Control Equipment: Dry Filters CE 5C

Emission Point: EP 5C

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-630	96-200	Original Permit	6/11/96	Yes
96-A-630-S1	00-142	Revise Paint-Use Limit	3/26/00	No
96-A-630-S2	02-339	Remove Hourly Operating Condition	11/6/02	No
96-A-630-S3	08-497	Correct Operating Conditions	10/23/08	No
96-A-630-S4	08-621	Amend Operating Limits	10/29/09	No
96-A-630-S5	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall he given thirty (30) days prior to the relocation of equipment[1] (See Permit Conditiou 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipment modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.50	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.25[4]	NA	NA	NAAQS
$PM_{2.5}$	0.08[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	32
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	38
Exhaust Temperature (°F)	97 °F
Exhaust Flowrate (scfm)	9,188 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	Yes[1]	No	Performance test	One Time
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Testing was completed August 20, 2009.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. Emission Unit 5 (EU-5) shall not exceed 20 hours of operation per day.

C. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record of all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

E. For EU-5 record the number of hours operated each day.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Exterior Paint Room (EU 5)

Control Equipment: Dry Filters CE 5D

Emission Point: EP 5D

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-631	96-200	Original Permit	6/11/96	Yes
96-A-631-S1	00-142	Revise Paint-Use Limit	3/26/00	No
96-A-631-S2	08-621	Amend Operating Limits	10/29/09	No
96-A-631-S3	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal peualties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nouattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

---

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 aud 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.50	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.25[4]	NA	NA	NAAQS
$PM_{2.5}$	0.08[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Emission limit used to minimize the PTE.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	32
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	38
Exhaust Temperature (°F)	97 °F
Exhaust Flowrate (scfm)	9,188 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	Yes[1]	No	Performance test	One Time
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Testing was completed August 20, 2009.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. Emission Unit 5 (EU-5) shall not exceed 20 hours of operation per day.

C. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record of all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Coating Exhaust (EU 6A)

Control Equipment: Mini-pleat Filters

Emission Point: EP 6A

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-636	96-200	Original Permit	6/11/96	Yes
96-A-636-S1	00-142	Revise Paint-Use Limit	3/26/00	No
96-A-636-S2	08-621	Amend Operating Limits	10/29/09	No
96-A-636-S3	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Larry Sweet

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.2	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.6	NA	NA	NAAQS
$PM_{2.5}$	0.021[4]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[5]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[6] 27.5 lb organic HAP/gal ctg. Solids[7]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[5] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[6] NESHAP requirement for general use coating.
[7] NESHAP requirement for high performance coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	20
Exhaust Temperature (°F)	87 °F
Exhaust Flowrate (scfm)	13,129 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	Yes[1]	No	Performance Test	One Time
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Performance testing was successfully conducted March 29 thru April 2, 2012.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	2 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. The control equipment must be installed and operational by July 14, 2013.

C. EU 6 shall not exceed 20 hours of operation per day.

D. The filter (CE-6A) shall have a MERV rating of no less than 13.

E. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

F. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

G. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B,

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

G. Each day record the number of hours operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicaut	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: Mini-pleat Filters

Emission Point: EP 6B

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-529	00-142	Original Permit	3/26/00	No
00-A-529-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-529-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.20	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.60[4]	NA	NA	NAAQS
$PM_{2.5}$	0.021[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.
[8] NESHAP requirement for high performance coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36
Exhaust Temperature (°F)	87 °F
Exhaust Flowrate (scfm)	13,129 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	2 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. The control equipment must be installed and operational by July 14, 2013.

C. EU 6 shall not exceed 20 hour of operation per day.

D. The filter (CE-6B) shall have a MERV rating of no less than 13.

E. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

F. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

G. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J, and 6K).

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

G. Each day record the number of hours of operation for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: Mini-pleat Filters

Emission Point: EP 6C

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-530	00-142	Original Permit	3/26/00	No
00-A-530-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-530-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising ont of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Origiual Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal peualties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
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D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
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8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliauce Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.2	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.60[4]	NA	NA	NAAQS
$PM_{2.5}$	0.021[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC enuissious from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 uatural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36
Exhaust Temperature (°F)	87 °F
Exhaust Flowrate (scfm)	13,129 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	2 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. The control equipment must be installed and operational by July 14, 2013.

C. EU 6 shall not exceed 20 hour of operation per day.

D. The filter (CE-6C) shall have a MERV rating of no less than 13.

E. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

F. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

G. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J, and 6K).

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

G. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DENIED

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: Mini-pleat Filters

Emission Point: EP 6D

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-531	00-142	Original Permit	3/26/00	No
00-A-531-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-531-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evideuce may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissious except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, withiu 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Staudards (NAAQS) or a maintenauce area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.2	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.60[4]	NA	NA	NAAQS
$PM_{2.5}$	0.021[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.
[8] NESHAP requirement for high performance coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36
Exhaust Temperature (°F)	87 °F
Exhaust Flowrate (scfm)	13,129 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	2 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. The control equipment must be installed and operational by July 14, 2013.

C. EU 6 shall not exceed 20 hour of operation per day.

D. The filter (CE-6D) shall have a MERV rating of no less than 13.

E. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

F. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

G. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J and 6K)

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

G. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: Mini-pleat Filters

Emission Point: EP 6E

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-532	00-142	Original Permit	3/26/00	No
00-A-532-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-532-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in au area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1]. (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.10[4]	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.021[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36
Exhaust Temperature (°F)	87 °F
Exhaust Flowrate (scfm)	13,129 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	2 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. The control equipment must be installed and operational by July 14, 2013.

C. EU 6 shall not exceed 20 hour of operation per day.

D. The filter (CE-6E) shall have a MERV rating of no less than 13.

E. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

F. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

G. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B,

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

G. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: Mini-pleat Filters

Emission Point: EP 6F

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-533	00-142	Original Permit	3/26/00	No
00-A-533-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-533-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformauce with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committiug a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.20	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.60[4]	NA	NA	NAAQS
$PM_{2.5}$	0.021[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36
Exhaust Temperature (°F)	87 °F
Exhaust Flowrate (scfm)	13,129 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	2 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. The control equipment must be installed and operational by July 14, 2013.

C. EU 6 shall not exceed 20 hour of operation per day.

D. The filter (CE-6F) shall have a MERV rating of no less than 13.

E. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

F. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

G. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B,

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

G. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: None

Emission Point: EP 6G

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
93-A-256	96-200	Original Permit	6/11/96	No
93-A-256-S2	00-142	Revise Paint Usage Limit	3/26/00	No
93-A-256-S3	02-339	Remove Hourly Operating Condition	11/6/02	No
93-A-256-S4	08-497	Correct Operating Conditions	10/23/08	No
93-A-256-S5	08-621	Amend Operating Limits	10/29/09	No
93-A-256-S6	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

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PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.04[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.
[8] NESHAP requirement for high performance coating

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	16 x 19
Exhaust Temperature (°F)	88 °F
Exhaust Flowrate (scfm)	2,509 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	8 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. EU 6 shall not exceed 20 hour of operation per day.

C. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J, and 6K).

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: None

Emission Point: EP 6H

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-632	96-200	Original Permit	6/11/96	No
96-A-632-S1	00-142	Revise Paint Usage Limit	3/26/00	No
96-A-632-S2	02-339	Remove Hourly Operating Condition	11/6/02	No
96-A-632-S3	08-497	Correct Operating Conditions	10/23/08	No
96-A-632-S4	08-621	Amend Operating Limits	10/29/09	No
96-A-632-S5	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit sball be required prior to the initiation of construction of additional control equipment or equipment modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.04[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.
[8] NESHAP requirement for high performance coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	16 x 19
Exhaust Temperature (°F)	88 °F
Exhaust Flowrate (scfm)	2,509 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	8 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. EU 6 shall not exceed 20 hour of operation per day.

C. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J, and 6K).

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: None

Emission Point: EP 6I

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-633	96-200	Original Permit	6/11/96	No
96-A-633-S1	00-142	Revise Paint Usage Limit	3/26/00	No
96-A-633-S2	02-339	Remove Hourly Operating Condition	11/6/02	No
96-A-633-S3	08-497	Correct Operating Conditions	10/23/08	No
96-A-633-S4	08-621	Amend Operating Limits	10/29/09	No
96-A-633-S5	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.04[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.
[8] NESHAP requirement for high performance coating.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	16 x 19
Exhaust Temperature (°F)	88 °F
Exhaust Flowrate (scfm)	2,509 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

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Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

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13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

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Operating limits for this emission unit shall be:

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B. EU 6 shall not exceed 20 hour of operation per day.

C. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J, and 6K).

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: None

Emission Point: EP 6J

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-634	96-200	Original Permit	6/11/96	No
96-A-634-S1	00-142	Revise Paint Usage Limit	3/26/00	No
96-A-634-S2	02-339	Remove Hourly Operating Condition	11/6/02	No
96-A-634-S3	08-497	Correct Operating Conditions	10/23/08	No
96-A-634-S4	08-621	Amend Operating Limits	10/29/09	No
96-A-634-S5	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

---

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.04[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.
[8] NESHAP requirement for high performance coating

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	16 x 19
Exhaust Temperature (°F)	88 °F
Exhaust Flowrate (scfm)	2,509 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	8 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. EU 6 shall not exceed 20 hour of operation per day.

C. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J, and 6K).

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Railcar Interior Painting/Stencil & Touchup Painting (EU 6)
Heaters for Tank Cars (13 @ 2.5 MMBtu/hr each) (EU 12)
Heaters for Hopper Cars (4 @ 4 MMBtu/hr each) (EU 13)

Control Equipment: None

Emission Point: EP 6K

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
96-A-635	96-200	Original Permit	6/11/96	No
96-A-635-S1	00-142	Revise Paint Usage Limit	3/26/00	No
96-A-635-S2	02-339	Remove Hourly Operating Condition	11/6/02	No
96-A-635-S3	08-497	Correct Operating Conditions	10/23/08	No
96-A-635-S4	08-621	Amend Operating Limits	10/29/09	No
96-A-635-S5	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

---

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

---

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.04[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	2.6 lb organic HAP/gal ctg. Solids[7] 27.5 lb organic HAP/gal ctg. Solids[8]	40 CFR 63.3890(b)(1) & (2)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: The VOC PTE of the 17 natural gas heaters is 0.89 tons per year and counts against the 200 ton/yr bubble limit).
[7] NESHAP requirement for general use coating.
[8] NESHAP requirement for high performance coatings

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	29
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	16 x 19
Exhaust Temperature (°F)	88 °F
Exhaust Flowrate (scfm)	2,509 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	8 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Rubber Lining of Tank Cars (EU 7)

Control Equipment: Cell Filters (CE 7A)

Emission Point: EP 7A

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-1089	00-074	Original Permit	12/15/00	No
00-A-1089-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-1089-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.10[4]	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.02[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	37.7 lb organic HAP/gal ctg. solids	40 CFR 63.3890(b)(4)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	32
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	18
Exhaust Temperature (°F)	70 °F
Exhaust Flowrate (scfm)	5,400 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	2 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-7A) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

C. The control equipment must be installed and operational by July 14, 2013.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Rubber Lining of Tank Cars (EU 7)

Control Equipment: Cell Filters (CE 7B)

Emission Point: EP 7B

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-1090	00-074	Original Permit	12/15/00	No
00-A-1090-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-1090-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

---

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.10[4]	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.02[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	37.7 lb organic HAP/gal ctg. solids	40 CFR 63.3890(b)(4)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	31
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	46
Exhaust Temperature (°F)	70 °F
Exhaust Flowrate (scfm)	25,000 scfm

The temperature and flow rate are intended to be representative aud characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate aud no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	4 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	2 hours	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	11 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not snbject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-7B) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

C. The control equipment must be installed and operational by July 14, 2013.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall he kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Adininistrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Rubber Lining of Tank Cars (EU 7)

Control Equipment: Cell Filters (CE 7C)

Emission Point: EP 7C

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
00-A-1091	00-074	Original Permit	12/15/00	No
00-A-1091-S1	08-621	Amend Operating Limits	10/29/09	No
00-A-1091-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.10[4]	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.02[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	37.7 lb organic HAP/gal ctg. solids	40 CFR 63.3890(b)(4)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate complianec (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	31
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	46
Exhaust Temperature (°F)	70 °F
Exhaust Flowrate (scfm)	25,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	4 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	2 hours	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	11 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-7C) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

C. The control equipment must be installed and operational by July 14, 2013.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Rubber Lining Building Ventilation (EU 7)

Control Equipment: Cell Filters (CE 7D)

Emission Point: EP 7D

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
10-A-043	10-26	Original Permit	3/12/10	No
10-A-043-S1	10-255	Amend HAP Coating Limit	6/16/10	No
10-A-043-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits, and Change Exhaust To Vertical Unobstructed	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.10[4]	NA	0.01 gr/dscf	23.4(13)
PM_{10}	0.10[4]	NA	NA	NAAQS
$PM_{2.5}$	0.02[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	200[6]	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	37.7 lb organic HAP/gal ctg. solids	40 CFR 63.3890(b)(4)

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.
[6] Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	23
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	16
Exhaust Temperature (°F)	70 °F
Exhaust Flowrate (scfm)	4000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	2 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-7D) shall have a MERV rating of no less than 13.

B. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

C. The control equipment must be installed and operational by July 14, 2013.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

B. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

C. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DRAFT

Permitted Equipment

Emission Unit(s): Inline Tank Car Qualification Process Welding and Plasma Cutting (EU 9)

Control Equipment: Mini Pleat Filter (CE 9A)

Emission Point: EP 9A

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plaut Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
09-A-009	08-621	Original Permit	10/29/09	No
09-A-009-S1	10-340	Remove Operating Hour Limitation	9/2/10	No
09-A-009-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may coutinue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	2.50	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	0.65[4]	NA	NA	NAAQS
$PM_{2.5}$	0.027[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	28
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36
Exhaust Temperature (°F)	70 °F
Exhaust Flowrate (scfm)	13,500 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hours	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	7 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-9A) shall have a MERV rating of no less than 13.

B. The control equipment must be installed and operational by July 14, 2013.

C. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent

Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DNR

Permitted Equipment

Emission Unit(s): Inline Tank Car Qualification Process Welding and Plasma Cutting (EU 9)

Control Equipment: Mini Pleat Filter (CE 9B)

Emission Point: EP 9B

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
09-A-010	08-621	Original Permit	10/29/09	No
09-A-010-S1	10-340	Remove Operating Hour Limitation	9/2/10	No
09-A-010-S2	12-409	Add Particulate Filter, Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	2.50	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	0.65[4]	NA	NA	NAAQS
$PM_{2.5}$	0.027[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on dispersion modeling.
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	28
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	36
Exhaust Temperature (°F)	70 °F
Exhaust Flowrate (scfm)	25,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	Yes[1]	No	Performance Testing	One Time
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

[1] Performance Testing successfully completed April 3 thru 4, 2012.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	7 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The filter (CE-9B) shall have a MERV rating of no less than 13.

B. The control equipment must be installed and operational by July 14, 2013.

C. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain a record for all maintenance and replacement of the control equipment.

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent

Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is uot subject to any applicable NSPS requirements as there are no applicable subparts at this time.

B. This emission unit is subject to 40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

14. Operating Limits

Operating limits for this emission unit shall be:

A. The control equipment shall be maintained and replaced per manufacturer's instructions and specifications.

B. EU 6 shall not exceed 20 hour of operation per day.

C. The volatile organic content of any paint utilized shall not exceed 5.2 pounds per gallon.

D. Total VOC emissions from coating operations (EU 5, 6, 7, 12, and 13) shall not exceed 200 tons per 365-day rolling period. (Note: coating operations include Railcar Exterior Painting (EU-5), Railcar Interior Painting/Touchup Painting (EU 6, 12, and 13), and Rubber Lining of Tank Cars (EU-7)

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. The owner or operator shall maintain records on the premises to show the twelve-month- period total gallons, rolled monthly, of paint used in the railcar interior coating operations identified as (EU 6A, 6B, 6C, 6D, 6E, 6F, 6G, 6H, 6I, 6J, and 6K).

B. The owner or operator shall maintain record for the interior coating operations to show the volatile organic compound content, measured in pounds per gallon, of materials sprayed.

C. For all coating operations (EU 5, 6, 7, 12, and 13) record the amount of coating or solvent used (in gallons) and the VOC content of all coatings or solvents used (in lbs/gallon) each day.

D. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions each day.

E. For all coating operations (EU 5, 6, 7, 12, and 13) calculate the total VOC emissions per 365-day rolling period.

F. Each day record the number of hour operated for EU 6.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources
Air Quality Construction Permit

Permit Holder

Firm: Union Tank Car Company – Muscatine Repair Shop

Contact:

David Herrin
Manager Environmental Compliance

(312) 431-3111 Ext. 3168

175 W. Jackson Blvd.
Chicago, Illinois 60604

Responsible Party:

Troy McKim
Plant Manager

DNR

Permitted Equipment

Emission Unit(s): Water Blast Operation (EU 27)

Control Equipment: None

Emission Point: EP 27

Equipment Location: 2603 Dick Drake Way
Muscatine, Iowa 52761

Plant Number: 70-01-048

Permit No.	Proj. No.	Description	Date	Testing
94-A-434	94-153	Original Permit	8/9/94	No
94-A-434-S1	08-621	As-Built, Removed Control Equipment, Vented Inside	10/29/09	No
94-A-434-S2	12-409	Establish PM2.5 Limits	4/8/13	No

Under the Direction of the Director of
the Department of Natural Resources

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f', this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment[1] (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

[1] A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

(1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or

(2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or

3. Construction (Continued)

(3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3.a. Origiual Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

(1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
(2) The permit becomes void.

The owner or operator shall obtain a new permit if:

(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) *"Maintenance and Repair"*.

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6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

A. The owner shall furnish the DNR the following written notifications:
   1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
   2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
   3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
   4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
   5. Transfer of equipment ownership, within 30 days of the occurrence;
   6. Portable equipment relocation:
      a. at least thirty (30)days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
      b. at least fourteen (14) days before equipment relocation.

B. The owner shall furnish the DNR with the following reports:
   1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
   2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
   3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-4899
Fax: (515) 242-5098

8. Notification, Reporting, and Recordkeeping (Continued)

E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	IDNR Field Office 6 1023 West Madison Washington, Iowa 52353 Phone: (319) 653-2135 Fax: (319) 653-2856

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to $10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr[1]	tons/yr[2]	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.17[4]	NA	0.1 gr/dscf	23.3(2)"a"
PM_{10}	0.17[4]	NA	NA	NAAQS
$PM_{2.5}$	0.037[5]	NA	NA	NAAQS
Opacity	NA	NA	40%[3]	23.3(2)"d"
Sulfur Dioxide (SO_2)	NA	NA	NA	NA
Nitrogen Oxides (NO_X)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

[1] Standard is expressed as the average of three (3) runs.
[2] Standard is a 12-month rolling total.
[3] An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
[4] Limit based on 0.1 gr/dscf..
[5] The limit for PM2.5 emissions is established to address the "Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision" for PM2.5 published in the Federal Register (76 FR 41424) on July 14, 2011.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	NA - Vents Inside
Discharge Style	NA - Vents Inside
Stack Opening, (inches, dia.)	NA
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	NA

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM_{10}	No	No	NA	NA
$PM_{2.5}$	No	No	NA	NA
Opacity	No	No	NA	NA
SO_2	No	No	NA	NA
NO_X	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202
PM_{10}	1 hour	40 CFR 51, Appendix M, 201A with 202
$PM_{2.5}$	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO_2	1 hour	40 CFR 60, Appendix A, Method 6C
NO_X	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

A. This emission unit is not subject to any applicable NSPS NESHAP requirements as there are no applicable subparts at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

A. Operating limits are not required at this time.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

A. Operating condition monitoring is not required at this time.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
N/A	Not Applicable

NO_X	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM_{10}	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS