

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

Facility Name: **GATX - Waycross**

City: Waycross

County: Ware County

AIRS #: 04-13-299-00015

Application #: TV-17825

Date SIP Application Received: November 28, 2007

Date Title V Application Received: November 28, 2007

Permit No: 4741-299-0015-V-02-1

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
4741-299-0015-V-02-0	October 4, 2007		✓

B. Regulatory Status

1. PSD/NSR/RACT

The facility is a potential major source for PSD review, but has taken a VOC limit of 249 tons per year in order to remain a minor source and avoid PSD review.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

GATX-Waycross will install a new degassing engine (C24) that will be used to destruct explosive vapors residual in railcars from the flammable liquids purge system (0019), this new unit is identical and will run parallel to the existing purge engine C19; an additional interior blasting spot (0022) which will vent to existing blast baghouses C11 & C12; an exempt portable blasting equipment (0022a) that will be used to remove the interior lining materials from railcars, and a new solvent still (0023) that will be used to recover product from waste solvent, evaporate the solvent and transfer the clean liquid into a holding drum.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	✓	2.02	2.02
PM ₁₀	✓	2.02	2.02
SO ₂	✓	0.40	0.40
VOC	✓	0	0
NO _x	✓	0.57	0.57
CO	✓	0.74	0.74
TRS	✓	0	0
H ₂ S	✓	0	0
Individual HAP	✓	<0.11	<0.11
Total HAPs	✓	0.11	0.11

C. PSD/NSR Applicability

The facility is a potential major source for PSD review, but has taken a VOC limit of 249 tons per year in order to remain a minor source and avoid PSD review.

III. Facility Wide Requirements

A. Emission and Operating Caps

The facility is limited to 249 tons per year of volatile organic compound (VOC) emissions.

B. Applicable Rules and Regulations

There is no change with this modification.

C. Compliance Status

No noncompliance issues currently exist.

D. Operational Flexibility

The facility did not indicate that the process or equipment is involved in an alternate operating scenario.

E. Permit Conditions

There is no permit condition change with this modification.

IV. Regulated Equipment Requirements

A. Brief Process Description

Railcar Cleaning Operations (Equipment Group 0002): Liquid residual amounts of commodities in the railcars are removed for sale or disposal off-site. The cars are then sent to the cleaning station where residual vapors are removed by one of four systems depending on the type of vapors.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
0009	Exterior Painting	40 CFR Part 63, Subpart Mmmm, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.2.1 thru 6.2.4, 6.2.7 thru 6.2.19	C9	Fabric Filters
0013	Interior Painting/Lining	40 CFR Part 63, Subpart Mmmm, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.2.1 thru 6.2.4, 6.2.7 thru 6.2.19	C13	Fabric Filters
0016	Tankcar Cleaning	Toxic Guideline	2.1.1, 3.2.1, 3.2.2, 3.5.2, 3.5.3, 5.2.1, 5.2.2, 6.2.2, 6.2.3	C16a/C16b	Venturi Scrubber /Carbon Adsorber
0017	Pressurized Flammable Gas Purge System	Toxic Guideline	2.1.1, 3.2.1, 3.5.4, 3.5.5, 3.5.6, 3.5.7, 5.2.3, 5.2.4, 6.2.2, 6.2.3	C17	Flare
0018	Pressurized Corrosive Inorganic Gas Purge System	Toxic Guideline	2.1.1, 3.2.1, 3.2.2, 3.5.8, 3.5.9, 5.2.5, 6.2.2, 6.2.3	C18	Sparge Tank / Packed Scrubber
0019	Flammable Commodities Purge System	Toxic Guideline	2.1.1, 3.2.1, 3.5.9, 5.2.6, 6.2.2, 6.2.3	C19	Purge Engine
				C24	Purge Engine
0020	Small Parts Painting and Touchup	40 CFR Part 63, Subpart Mmmm, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.2.1 thru 6.2.4, 6.2.7 thru 6.2.19	C20	Fabric Filter
0021	Exterior Blasting	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.10, 5.2.7	C8	Baghouse
0011	Interior Blasting	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.10, 5.2.7	C11/C12	Baghouse
0012	Interior Blasting				
0022	Interior Blasting				
0023	Solvent Reclamation Still			None	N/A

C. Equipment & Rule Applicability

- Emission and Operating Caps

There is no change with this modification.

- Applicable Rules and Regulations -

There is no change with this modification.

D. Compliance Status

No noncompliance issues were indicated in the application.

E. Operational Flexibility

The facility did not indicate that the process or equipment is involved in an alternate operating scenario.

F. Permit Conditions

Permit condition 3.5.9 has been modified to include Purge Engine C24.

Permit condition 3.5.10 has been modified to separate the exterior operation (ID No. 0021), which is controlled by baghouse C8, and interior blasting operations (ID Nos. 0022, 0011 and 0012), which are controlled by baghouses C11 and C12.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

5.2 Specific Monitoring Requirements

Condition 5.2.6 has been modified to include Purge Engine C24.

Condition 5.2.7 has been modified to change the baghouse Nos. from C21 and C22 to C8, C11 and C12.

VII. Other Record Keeping and Reporting Requirements

6.1 General Record Keeping and Reporting Requirements

Condition 6.1.7 has been modified to include Purge Engine C24 and to change the baghouse Nos. from C21 and C22 to C8, C11 and C12.

6.2 Specific Record Keeping and Reporting Requirements

Condition 6.2.5 has been modified to change the baghouse Nos. from C21 and C22 to C8, C11 and C12.

VIII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

The facility did not indicate that the process or equipment is involved in an alternate operating scenario.

B. Alternative Requirements

There are no alternative requirements indicated.

C. Insignificant Activities

None applicable.

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

Based on all presently available information, no compliance or progress reports are necessary.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

The facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Prevention of Accidental Releases

None applicable.

J. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit.

K. Pollution Prevention

None applicable.

L. Specific Conditions

None

Addendum to Narrative

EPA comment period ended May 12, 2008 – no comments were received.