

Facility Name: **GATX-Waycross**  
 City: Waycross  
 County: Ware  
 AIRS #: 04-13-299-00015

Application #: TV-8967  
 Date Application Received: October 1, 1996  
 Date Application Deemed Administratively Complete: March 4, 1997  
 Date of Draft Permit:  
 Permit No: 4741-299-0015-V-01-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to GATX-Waycross and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Facility Identification**

1. Facility Name: GATX-Waycross
2. Parent/Holding Company Name: General American Transportation
3. Previous and/or Other Name(s): The facility is also known as GATX and GATC.
4. Facility Location: The facility is located at 2610 Industrial Boulevard, in Waycross, (Ware County), Georgia.
5. Attainment or Non-attainment Area Location: The facility is located in Ware County, outside of the non-attainment area.
6. Class I Area Impacts: The facility is located within 100km of the Okefenokee National Wildlife Refuge and Wilderness Class I Area.

**B. Site Determination**

The facility comprises one Title V site. There are no other facilities that could possibly be contiguous or adjacent and under common control.

**C. Existing Permits**

"Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below."

**Table 1: List of Current Permits as Amended**

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
4741-148-11119	Issued 10/13/1993 and Amended 11/18/1996		✓

**Table 2: Comments on Specific Permits**

Permit Number	Comments
4741-148-11119	None.

## D. Process Description

## 1. SIC Codes(s): 4741

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

## 2. Description of Product(s): The facility cleans and refurbishes leased railcars.

## 3. Overall Facility Process Description: The facility consists of several independent processes: railcar cleaning operations, interior lining operations, and exterior coating operations.

## 4. Overall Process Flow Diagram (optional): See Attachment.

## E. Regulatory Status

## 1. PSD/NSR: 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 <sub>10</sub>	✓			✓
SO <sub>2</sub>	✓			✓
VOC	✓	✓		
NO <sub>x</sub>	✓			✓
CO	✓			✓
TRS	✓			✓
H <sub>2</sub> S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards: The facility will be subject to the MACT standard for miscellaneous metal parts and products proposed August 13, 2002. Prior to this NESHAP becoming final, the facility may become subject to a case-by-case MACT determination issued under the authority of Section 112 (j) of the Clean Air Act.
4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	No.
Program Code 8 – Part 61 NESHAP	No.
Program Code 9 - NSPS	No.
Program Code M – Part 63 NESHAP	No.
Program Code V – Title V	Yes.

## Regulatory Analysis

### II. 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
 

Rules and Regulations Assessment – None applicable.

Emission and Operating Standards – None applicable.
- 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

GATX has requested the following changes in the conditions of Air Quality Permit No. 4741-148-1119:

1. The facility has requested that Condition No. 1 of its existing permit be eliminated because “Language such as this will ultimately be superseded by specific requirements under the compliance assurance monitoring rule.”

Condition No. 1 provides for the proper general operation of all sources and their associated air pollution control equipment. The condition is a general requirement in Title V permits and applicable to all sources.

2. The facility has request Condition No. 10 be eliminated because “Condition 10 is superseded by Condition No. 26 as amended 10/96.

Condition No. 10 was deleted in Amendment to Permit No. 4741-148-1119 dated November 18, 1996 and will not be added to the facility’s Title V permit.

3. The facility has requested that Condition Nos. 12 –14, which specify for maintenance of air pollution control equipment be deleted because “language such as this will ultimately be superseded by specific requirements under the compliance assurance monitoring rule.”

Condition Nos. 12 – 14 provide for the proper routine maintenance of the facility’s air pollution control equipment.

4. The facility has requested that Condition No. 20, which requires that the Permittee notify the Division in writing if the VOC emissions exceed 20.8 tons during any calendar month, be eliminated since “ condition is redundant with Condition No. 4. [and that the] facility will comply with annual VOC emission limit specified in Condition No.4 as a 12-month rolling total.”

Condition No. 20 is used as a monthly monitoring technique so that the VOC emission cap of 249 tons per year is not exceeded in any consecutive 12-month period. If in any given month VOC emissions exceed 20.8 tons the Permittee shall notify the Division so that steps can be taken to ensure that the facility remains below yearly limit.

5. The facility has requested that Condition No. 24 which makes old Air Quality Permits Nos. 3743-148-1621-O, 3743-148-6569-O, and 3743-148-8754 null and void after one year of issuance of Permit No 4741-149-1999 be eliminated since “the one year period from issuance of Permit Number 4741-148-11119 has elapsed”

The condition has been removed.

6. The facility has requested that Condition No. 29, which prohibits the circumvention of any applicable standard, be eliminated since there is “no underlying applicable requirement.”

Condition No. 29 prohibits the use of any method to circumvent any applicable standards. The condition is included in the permit in order to ensure that all applicable standards are met.

7. The facility has requested that a hybrid condition dealing with Condition Nos. 2 and 3, which deals with compliance and performance testing respectively, be adopted because of “redundant permit conditions.”

New standard conditions in the Title V permit have replaced these conditions.

8. The facility has requested that Condition Nos. 5, 10, and 11, which put emission limits on various pollutants, be eliminated because “GA Toxic Guidelines are not Federally enforceable.”

Condition Nos. 5, 10, and 11 are conditions in an existing permit issued under a federally approved State Implementation Plan (SIP). All permits and conditions issued under that SIP permit are federally enforceable. Note: Condition No. 10 was replaced in Amendment to Air Quality Permit No. 4741-148-1119 dated November 18, 1996 with Condition No. 26

9. The facility has requested that Condition No. 6 which provides for operation and maintenance of an organic pressurized tank car gas purge system with a flare that achieves an overall emission reduction efficiency of at least 99 percent, be modified because “control device efficiencies specified in permits are not practically enforceable.” The facility also states “GA Toxic Guidelines are not Federally enforceable.”

A 99 percent control efficiency is required to meet the Toxic Guidelines and can be met by properly maintaining the flare and verifying that it is operational at all times the Pressurized Flammable Gas Purge System is operational. Conditions have been added that monitor the operation of the flare. Condition No. 6 is a condition in an existing permit issued under a federally approved State Implementation Plan (SIP). All permits and conditions issued under a federally approved SIP are federally enforceable.

10. The facility has requested that Condition Nos. 17, 19, and 21, which require record keeping and reporting, be combined into one hybrid condition.

Condition Nos. 17, 19, and 21 are in their standard form and will remain so in the new Title V permit.

11. The facility has requested that Condition Nos. 18 and 21, which require record keeping and reporting be combined into one hybrid condition.

Condition Nos. 18 and 21 are in their standard form and will remain so in the new Title V permit.

12. The facility has requested that Condition No. 22, which requires that the facility notify the Division when there is any change to the source, be modified to “more appropriately address state and federal permitting requirements.”

A condition requiring the facility to notify the Division of any change to the source is a general condition of the Title V permit stating a general requirement. A facility may at any time request more specific instructions on both state and federal permitting requirements.

Condition 2.1.1 limits the facility to 249 tons of VOCs per year in order for the facility to remain a minor source under PSD regulations.

### III. 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.

The first system (ID No. 0016) purges organic and inorganic commodity tank cars. A spray cleaning head is inserted into the sealed dome opening and a heated wash solution is sprayed into the tank car. The wash solution is then removed by a vacuum pump system through a receiver/separator tank. Any vapors exhausted from the cleaning system are directed to a Venturi scrubber and then through a carbon adsorber.

The second cleaning system (ID No. 0017) operates by directing any flammable pressurized gas to a flare.

The third cleaning method (ID No. 0018) directs pressurized inorganic corrosive gases to a scrubber.

The fourth system (ID No. 0019) operates by directing flammable liquids and vapors to an internal combustion engine.

#### Railcar Coating Operations (Equipment Group 0001):

Prior to painting, any small parts needing maintenance are grit-blasted and then painted in a designated area of the finishing building (ID No. 0020). This car maintenance work is performed before the railcars are sent to the Interior Lining and Exterior Coating (ID Nos. 0013 and 0009, respectively) operations.

If a railcar needs maintenance on its interior lining, the interior lining is removed by grit blasting (ID No. 22) the inside of the railcar. After the old lining is removed a new lining is manually applied at one of four stations (ID No. 0013). Following the application of the interior lining materials, the fresh air duct is removed and a duct from one of two heated air headers is dropped into the tank car opening to facilitate final curing of the lining.

When a railcar's exterior needs to be repainted, the outside surface of the railcar is prepared by removing the existing paint with manual grit blasting (ID No. 21). The rail cars are coated in an 85-foot long paint spray booth (ID No. 0009) and then sent through an infrared oven (ID No. 0010 – reported and listed under fuel burning equipment) to dry and cure the paint.

## 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	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 6.2.1, 6.2.2	C9	Fabric Filters
0013	Interior Painting/Lining	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 6.2.1, 6.2.2	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
0020	Small Parts Painting and Touchup	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 6.2.1, 6.2.2, 6.2.3	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	C21	Baghouse
0022	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	C22	Baghouse

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

## C. Equipment &amp; Rule Applicability

**Emission and Operating Caps** – In order to comply with the Toxic Guideline, the following operating caps have been added to the permit:

Tank car cleaning operations are limited to one tank car per consecutive 24-hour period for the following commodities: Bromine, Methyl Chlorosilanes, Methyl Dichlorosilanes, Methyl Trichlorosilanes, Trichlorosilanes, Methyl Isocyanate, Methylene Diisocyanate, Nitrosyl Chloride, Benzene, Chloroform, Methyl Bromide, Hydrogen Bromide, and Hydrogen Chloride

Cleaning tank cars containing chlorine is limited to 2 tank cars during any consecutive 24-hour period.

Tank cars containing methyl bromide must be flared for at least 3 hours.

A maximum of 2,125 pounds of methyl bromide can be flared in a 2-consecutive hour period.

**Applicable Rules and Regulations** –

Rules and Regulations Assessment:

Georgia Rule 3-91-3-1-.02(2)(b) applies to all sources (ID Nos. 0009, 0013, 0016, 0017, 0018, 0019, 0020, 0021, and 0022) that are subject to at least one other emission limitation and are not subject to any other, more stringent, opacity standard.

Georgia Rule 3-91-3-1-.02(2)(e)(1)(i) applies to all manufacturing processes with particulate matter emissions. The specific applicable requirements for this facility's equipment (ID Nos. 0009, 0013, 0016, 0017, 0018, 0019, 0020, 0021, and 0022) are those for all manufacturing processes in operation or under construction contract after July 2, 1968.

Emission and Operating Standards:

Georgia Rule 3-91-3-1-.02(2)(b) limits visible emissions to 40 percent opacity.

Georgia Rule 3-91-3-1-.02(2)(e)(1)(ii) limits particulate emissions based on the following equation:

$$E = 4.1(P)^{0.67} \text{ where } E \text{ equals the allowable particulate emission rate in pounds per hour and } P \text{ equals the process input weight rate in tons per hour.}$$

In order to maintain compliance with these standards, the facility will be required to change both the exterior and interior painting filters (ID Nos. C9, C13, and C20) on a monthly basis. The baghouse filters (ID Nos. C21 and C22) will be changed any time the pressure drop across the filter system falls outside the range of 1 to 8 inches of water. The cleaning operations are not likely to produce particulate matter in amounts significant enough to violate these standards.

- D. Compliance Status: No noncompliance issues exist.
- E. Operational Flexibility: The facility did not indicate that the process or equipment is involved in an alternate operating scenario.
- F. Permit Conditions:

A toxic impact assessment was performed on the railcar cleaning operations in October 1996 which included an expansion of the railcar cleaning operations. A Screen 3 model was run and based on 24 hours of emissions for all commodities except those listed in Condition No. 3.2.1 which were modeled on 1 hour of operation per day as requested by the facility since the time to clean one railcar of these commodities is 1 hour. Vinyl chloride emissions were modeled for 50 hours per week. By limiting railcar-cleaning operations to no material exceeded the acceptable ambient concentrations. Conditions 3.2.1 and 3.2.2 incorporates these limits.

Condition No. 3.4.1 incorporates the standards of Georgia Rule (b) into the permit.

Condition No. 3.4.2 incorporates the standards of Georgia Rule (e) into the permit.

Condition No. 3.5.1 requires that the facility change the filters (ID No. C9, C13, and C20) associated with the painting operations (ID Nos. 0009, 0013, and 0020) on a monthly basis.

Condition Nos. 3.5.2 through 3.5.9 relate to the equipment specific requirements necessary to comply with the toxic guideline. Specifically,

Condition No. 3.5.2 requires that the tankcar cleaning system's (ID No. 0016) scrubber and carbon adsorber (ID Nos. C16a and C16b, respectively) achieve an overall emission reduction efficiency of at least 98 percent.

Condition No. 3.5.3 requires that the tankcar cleaning system (ID No. 0016) achieves an overall emission reduction efficiency of at least 98 percent for chlorofluorocarbons (CFC) vented to the system.

Condition No. 3.5.4 requires that the flare (ID No. C17) to the organic commodity pressurized tank car gas purge system (ID No. 0017) provides an overall emission reduction efficiency of at least 99 percent.

A toxic impact assessment was performed when the facility submitted an application for the original equipment at the facility (June of 1993). In order to assure that no material exceeded maximum allowable concentrations, Condition No. 3.5.5 requires that all tank cars containing methyl bromide are flared for at least a 3-hour period, and Condition No. 3.5.6 requires that no more than 2,125 pounds of methyl bromide be flared during any 2-consecutive hour period.

Condition No. 3.5.7 requires that the flare (ID No. C17) to the organic commodity pressurized tank car gas purge system (ID No. 0017) achieves an overall emission reduction efficiency of at least 99.5 percent when flaring ammonia.

Condition No. 3.5.8 requires that the scrubber (ID No. C18) of the corrosive inorganic gas purge system (ID No. 0018) achieves an overall emissions reduction efficiency of at least 99.8 percent.

Condition No. 3.5.9 requires that the Purge Engine (ID No. C19) of the Flammable Commodities Purge System (ID No. 0019) achieves an overall emission reduction efficiency of at least 99 percent.

Condition No. 3.5.10 requires that the baghouse filters for the exterior and interior blasting operations (ID Nos. 21 and 22) are change when the static pressure drop across the filter system falls outside the range of 4 to 6 inches of water. This condition assures compliance with Georgia Rules (b) and (e).

#### **IV. Testing Requirements (with Associated Record Keeping and Reporting)**

- A. General Testing Requirements: The permit contains general requirements for any required testing. A condition requiring written prior notification of any test is included. The test methods to be used to determine compliance, if required in the future, are listed in Condition 4.1.3.
- B. Specific Testing Requirements
  - 1. Individual Equipment: None required.
  - 2. Equipment Groups (all subject to the same test requirements): None required.

**V. Monitoring Requirements (with Associated Record Keeping and Reporting)**

A. General Monitoring Requirements: The Permit contains general requirements for the operation of any required monitoring equipment. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should also be recorded during any calibration activity to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements:

1. Individual Equipment:

a. Specific monitoring requirements:

The following monitoring provides an indication of proper operation which in turn provides an indication of compliance with the toxic guideline requirements for ID Nos. 0016,0017, 0018, 0019, and an indication of compliance with GA Rules (b) and (e) for ID Nos. 0021 and 0022.

ID No. C16a: To insure the proper level of control efficiency for the venturi scrubber, the scrubbant pH should be maintained between 9 and 12. The pH can be maintained by taking the pH measurements each day of operation that a railcar is vented to the scrubber.

ID No. C16b: To insure the proper level of control efficiency for the carbon adsorber, the amount of VOC breakthrough should be maintained to no more than 2,000 ppm. A photo ionization detector (PID) should be used once each month of operation to measure this VOC breakthrough.

ID No. C17: To insure the presence of a flame on the flare, the facility is required to install a heat sensing device and a recorder. The facility is also required to limit visible emissions from the flare upon startup. Within five minutes of startup, the facility is to adjust the flare so that there are no visible emissions. Since, the railcars are at a constant pressure, visible emissions will only occur when the flare begins operation. Five minutes after startup the facility is required to conduct a visible emissions check.

ID No. C18: To insure the proper level of control efficiency for the wet scrubber, the scrubbant pH should be maintained between 9 and 12 for railcars containing acidic products and between 3 and 6 for railcars containing alkaline products. The pH can be maintained by taking the pH measurements each day of operation that a railcar is vented to the scrubber.

ID No. C19: The IC engine is connected to a railcar and runs continuously until all vapors have been removed from the railcar and combusted by the engine. The facility will check to see that the engine operates when a railcar is routed to it, and before disconnecting any railcar from the IC Engine, the facility will be required to make sure that the engine has shut off completely.

ID No. C20: VOC emissions from the small parts painting and touch up operations will be monitored through facility-wide usage record keeping requirements of VOC materials.

ID Nos. C21 and C22: To insure proper operation of the baghouses controlling the interior and exterior blasting operations, a pressure drop indicator will be installed and the pressure drop across the baghouses will be read.

b. Record keeping for monitoring.

ID No. C16a: The facility is required to maintain records of the pH of the venturi scrubber. The measurements are required to be recorded in a logbook with the time and date of the reading.

ID No. C16b: The facility is required to maintain records of the PID reading of VOC breakthrough along with the time and date of the reading, and the time and date of when each carbon unit is replaced.

ID No. C17: The recorder the facility installs will record the presence of a flame. These records will be kept continuously. The facility is also required to maintain records of any occurrence of visible emissions during the visible emissions check five minutes after startup.

ID No. C19: The facility is required to maintain a log showing that the engine is not disconnected from a railcar before the engine shuts down.

ID Nos. 21 and 22: The facility is required to record the pressure drop across the baghouses once each week of operation.

c. Reporting for monitoring

ID No. C16a: The facility is required to report any occurrence of a railcar being routed to the scrubber when the pH is outside the range of 9 to 12 as an excursion.

ID No. C16b: The facility is required to report any failure to change the carbon unit at a level of VOC breakthrough greater than 2000 ppm as an excursion.

ID No. C17: The facility is required to report any instance in which the flare is operated without a flame. The facility is also required to report any occurrence of visible emissions during the visible emissions check five minutes after startup as an excursion.

ID No. C18: The facility is required to report any instance in which a railcar is routed to the wet scrubber when the pH falls outside the 4 to 6 range.

ID No. C19: The facility is required to report any occurrence of disconnecting a railcar from the IC engine before the engine has stopped running as an excursion.

ID Nos. 21 and 22: The facility is required to report any instance in which the filters of the baghouses are not changed if the pressure drop falls outside the range of 4 to 6 inches of water column.

2. Equipment Groups (all subject to the same monitoring requirements):

None Applicable.

## **VI. Other Record Keeping and Reporting Requirements**

- A. General Record Keeping and Reporting Requirements: The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from applicable requirements.
- B. Specific Record Keeping and Reporting Requirements
  1. Plant wide: The facility is limited to 249 tons of VOC emissions during any 12 consecutive months. In order to demonstrate compliance with this limit, the facility must maintain records of all VOC containing materials used, the number of gallons, the density and the VOC content of the material. The records are to be used to calculate the twelve consecutive month totals of VOC emissions. The records will also be used to calculate the monthly VOC emissions for the notification threshold. The facility is required to notify the Division if the 12-month rolling total of VOC emissions exceeds the VOC limit or if the monthly total VOC emissions exceed the notification threshold.
  2. Individual Equipment: Because of the Toxic Guideline, the facility is required to limit tank car cleaning operations to one tank car per consecutive 24-hour period for the following commodities: Bromine, Methyl Chlorosilanes, Methyl Dichlorosilanes, Methyl Trichlorosilanes, Trichlorosilanes, Methyl Isocyanate, Methylene Diisocyanate, Nitrosyl Chloride, Benzene, Chloroform, Methyl Bromide, Hydrogen Bromide, and Hydrogen Chloride. The facility is also required to limit cleaning tank cars containing chlorine to 2 tank cars during any consecutive 24-hour period. Tank cars containing methyl bromide have to be flared for at least 3 hours, and a maximum of 2,125 pounds of methyl bromide can be flared in a 2-consecutive hour period. In order to demonstrate compliance with these limitations, the facility will be required to maintain records on each railcar cleaned. The records will include a description of the residual material contained in the car, and the time and date the cleaning operation occurred in each car. These records should contain additional information for each railcar of methyl bromide cleaned, including the amount of methyl bromide sent to the flare and the length of time each railcar of methyl bromide is cleaned.

The facility is required to record the date and time the filters are changed on baghouse filters C9, C13, C20, C21, and C22 in order to demonstrate compliance with Conditions 3.5.1 and 3.5.10. This will in turn provide an indication of compliance with GA Rules (b) and (e).

3. Equipment Groups: None required.

## **VII. Specific Requirements**

- 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: All insignificant activities are listed in Attachment B of the Title V Permit.
- D. Temporary Sources: The facility has not requested to operate any temporary sources.
- E. Short-Term Activities: The facility did not report any short-term activities.
- F. Compliance Schedule/Progress Reports: Based on all presently available information, no compliance or progress reports are necessary.
- G. Emissions Trading: The facility is not involved in any emissions trading.
- 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: The facility is not subject to the Accidental Release Prevention Program.
- 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: There are no pollution prevention provisions incorporated into this Title V Permit.
- L. Specific Conditions: None.

**VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

## Addendum to Narrative

EPD issued draft Title V Permit 4741-299-0015-V-01-0 for GATX – Waycross’s railcar cleaning and refurbishing facility in Waycross, Georgia on February 10, 2003. The public notice for this permit was published in the Waycross Journal Herald on March 8, 2003. The public and EPA comment periods expired April 7, 2003, and April 22, 2002, respectively. Comments were received from GATX - Waycross on March 11, 2003, however, no comments were received from the public or EPA.

Below are EPD’s responses to questions and issues raised by GATX – Waycross.

1. Issue: “**Section 3.1:** Emission Unit ID No. 0020, Small Parts Painting and Touchup has a Water Bath control device and not a fabric filter.”

Response: The comment was withdrawn per an April 11, 2003 telephone conversation with Jay Grove, Director E, H & S.

2. Issue: “**Section 3.2.1:** There was no limit on the number of Methyl Bromide cars in the existing permit and Methyl Bromide (item k) should be removed from this section. The amount of Methyl Bromide is limited by the emission cap in Section 3.5.6 and should not be dependent on the number of cars.”

Response: The Methyl Bromide limit was removed in the amendment to Air Quality Permit No. 4711-148-11119 and since the amount of Methyl Bromide that can be flared is limited to 2,125 lbs in a 24 consecutive hour period, Condition 3.2.1 is redundant and can be removed.

3. Issue: “**Section 3.5.1:** The Small Parts Painting and Touchup operation (ID No. 0020) reference needs to be deleted based on the change in Section 3.1.”

Response: See issue No. 1. The comment was withdrawn per an April 11, 2003 telephone conversation with Jay Grove, Director E, H & S.

4. Issue: “**Section 3.5.1(ID Nos. 009 &0013):** Filter changes should be made on the exterior booth (ID 009) on an ‘as needed’ basis. For example, if a GATX only painted five cars in a given month, the paint filters would not require changing. In addition, the interior lining operation (ID 0013) requires only small “ventilation” filter to cover the manway opening. By nature of the lining operation, there are virtually no particulate emissions. Particles that do not adhere to the surface that they are being applied to will simply bounce off of that surface and adhere to another surface with in the tank car. The ventilation filters are currently inspected on a monthly basis and replaced as needed. As a result, GATX requests that this section be replaced with the following:

‘The Permittee shall ensure that the particulate matter emissions from the exterior paint and interior lining operations (ID No. 09 and 13) are controlled by paint arrest filters. The exterior paint filter system (ID 09) shall be operated and maintained according to the manufacturer’s specifications. The Permittee shall perform a weekly check for filter integrity and shall change the filters when required. Ventilation filters shall be placed over all railcar openings when conducting interior lining operations (ID 13). These filters shall be inspected monthly and shall be changed when required.’”

Response: Because of the slowdown in the economy, it is feasible that the facility could only paint a small number of railcars in a given time period. As the condition was in the draft, this could result in the facility changing an unused filter. The requested changes have been made, however, in addition to weekly visual inspections of the filters, the facility must maintain a log of the filter checks and the number of railcar coats applied for each week of operation as an indicator to why the filters may have been changed out less frequently.

5. Issue: **Section 3.5.10:** GATX feels that a condition that requires the changing of the baghouse filters due to being outside the pressure drop values of 4-6 inches of water column is not appropriate. This condition does not take into account the individual operating characteristics of the baghouses or allow repairs that may not require replacement of the filters. GATX request that this section be replaced with the following:

“The Permittee shall ensure that the particulate matter emissions from the exterior and interior blasting operations (ID No. 21 and 22) are controlled by baghouses C21 and C22. The baghouses shall be operated and maintained according to the manufacturers’ specifications. The Permittee shall perform a check for visible emissions and when visible emissions are observed, the Permittee shall take corrective actions that eliminates the visible emissions within 24 hours.”

Response: Monitoring the pressure drop for a baghouse is a standard monitoring strategy, therefore Condition No. 3.5.10 will remain the same except that per an April 11, 2003 telephone conversation with Jay Grove, Director E, H & S, the excursion limit has been changed to a value outside of the range of 2 to 8 in order to offer a margin of compliance.

6. Issue: **“Section 5.2.7:** In keeping with the requested change in Section 3.5.10, GATX requests the following change:

“a. The Permittee shall perform a visible emissions check of the baghouses (ID Nos. C21 and C22) controlling the exterior and interior blasting operations. The results of the visible emissions check shall be recorded in a form suitable for inspection or submittal to the Division. Data shall be recorded once each week of operation.”

Response: See issue No. 5. No change to Condition No. 5.2.7 will be made.

7. Issue: **“Section 6.1.7c:**

- i. The reference to the Small Parts Painting and Touchup Operations (ID No. 0020) needs to be removed

‘The Permittee shall ensure that the particulate matter emissions from the exterior and interior blasting operations (ID No. 21 and 22) are controlled by baghouses C21 and C22. The baghouses shall be operated and maintained according to the manufacturers’ specifications. The Permittee shall perform a check for visible emissions and when visible emissions are observed, the Permittee shall take corrective actions that eliminates the visible emissions within 24 hours.’

- ii. The effectiveness of the Venturi scrubber is not affected if the pH goes over 12. GATX requests that the section be changed to read:

‘Any instance in which a railcar vented to the Venturi scrubber (ID No. C16a) with a scrubbant pH less than 9.’”

Response:

- i. See issue No. 1. The comment was withdrawn per an April 11, 2003 telephone conversation with Jay Grove, Director E, H & S.
  - ii. Condition 6.1.7(c)(ii) has been changed as appropriate. After conversations with Jay Grove, Director E, H & S on June 26, 2003, the excursion limit has been changed to a minimum pH of 7 to offer a margin of compliance.
8. Issue: “**Section 6.1.7c:**
- vi. The packed scrubber is a system for scrubbing caustic materials and the scrubbant is always based on that purpose. GATX requests the following:  
  
‘Any instance in which a railcar is vented to the packed scrubber (ID No. C18) when the scrubbant pH greater than 9.’
  - viii. In keeping with the change in Section 3.5.10, GATX requests the following change:  
  
‘Any failure to repair components or replace filters of baghouses C21 and C22 within 24 hours after a visible emission check where visible emissions were detected.’”

Response:

- vi. Conversations with Jay Grove, Director E, H & S on June 26, 2003 indicate that an error was made in the submitted comments. The scrubber is a caustic scrubber and only acidic materials will be sent to the scrubber. The excursion limit has been changed to a minimum pH of 7 to offer a margin of compliance.
  - viii. See issue No. 5. No change to Condition No. 6.1.7(c)(viii) will be made.
9. Issue: “**Section 6.2.2:** Based on the existing permit limit of 249 tons, the monthly allowed volatile organic emissions should be 20.8 tons and not 8.33 tons.”

Response: The permit has been corrected as appropriate. 1/12<sup>th</sup> of 249 tons is 20.75 tons.

10. Issue: “**Section 6.2.3:** The last two sentences in this section do not appear to be necessary since the monthly emissions are required to be monitored by Section 6.2.2. Please delete the last two sentences with the reference to 100 tons during any twelve consecutive months.”

Response: Condition No. 6.2.2 is a monthly notification trigger value, not a limit, which is used to ensure compliance with the annual limit in Condition No. 2.1.1, while Condition No. 6.2.3 requires that the facility use the monthly values in Condition No. 6.2.2 to calculate a twelve month consecutive value in order to confirm compliance with the VOC limit in Condition No. 2.1.1. No change to Condition 6.2.3 will be made.

11. Issue: “**Section 6.2.5:** The reference to C20 should be removed based on the change in Section 3.1.”

Response: See issue No. 1. The comment was withdrawn per an April 11, 2003 telephone conversation with Jay Grove, Director E, H & S.

12. Issue: “**Insignificant Activities:** GATX has two additional sources that need to be added to Attachment B. The sources are as follows:

- Vacuum Loader powered by a 32 Hp natural gas fired engine and the engine operates less than 2000 hours per year
- Hopper Car Dryer with a furnace that is natural gas fired with a heat input of approximately 2.5MM BTU/hr.”

Response: The changes have been made as requested.