Federally Enforceable State Operating Permit Renewal
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY AND VIGO COUNTY AIR POLLUTION CONTROL

GATX Corporation
4400 Maple Ave.
Terre Haute, Indiana 47804

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F167-24547-00130	
Issued by: //Original Signed By// George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: October 23, 2007 Expiration Date: October 23, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary railcar cleaning system.

Source Address:	4400 Maple Ave., Terre Haute, Indiana 47804
Mailing Address:	500 W. Monroe St., 41st Floor, Chicago, IL 60661
General Source Phone Number:	312-621-8456
SIC Code:	4789
County Location:	Vigo
Source Location Status:	Maintenance attainment for SO_2 and 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Railcar Wash Unit consisting of two (2) 1500 gallon tanks and one (1) 200 gallon per minute (gpm) pump, with a maximum capacity of cleaning 12 railcars per day (with a maximum residual volume of 5 gallons per car), exhausting to the ambient air.

(b) Vacuum Pump, with a maximum capacity of 270 cubic feet per minute (cfm), exhausting to stack 1.

(c) A flare with a maximum capacity of 15 million (MM) Btu per hour, exhausting to stack 2, used to purge compressed gas, mainly ammonia and LPG.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and VCAPC to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F167-24547-00130, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ and VCAPC, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and VCAPC, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and VCAPC may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and VCAPC may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ and VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and VCAPC within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Vigo County Air Pollution Control phone: (812) 462-3433; fax: (812) 462-3447

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and

VCAPC may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and VCAPC by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F167-24547-00130 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and VCAPC determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ and VCAPC to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and VCAPC at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and VCAPC may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and VCAPC and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and VCAPC take final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and VCAPC any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and VCAPC in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, and VCAPC or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ and VCAPC within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ and VCAPC the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may

open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.7 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ and VCAPC of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Railcar Wash Unit, constructed in 2001, consisting of two (2) 1500 gallon tanks and one (1) 200 gallon per minute (gpm) pump, with a maximum capacity of cleaning 12 railcars per day (with a maximum residual volume of 5 gallons per car), exhausting to the ambient air.

(b) Vacuum Pump, constructed in 2001, with a maximum capacity of 270 cubic feet per minute (cfm), exhausting to stack 1.

(c) A flare, constructed in 2002, with a maximum capacity of 15 million (MM) Btu per hour, exhausting to stack 2, used to purge compressed gas, mainly ammonia and LPG.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 New Source Toxics Control [326 IAC 2-4.1-1]

(a) The use of any single hazardous air pollutant (HAP), including residual product in the railcars and cleaning products, shall be limited to less than nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of single HAPs to less than ten (10) tons per twelve (12) consecutive month period.

(b) The total usage of hazardous air pollutants (HAPs), including residual product in the railcars and cleaning products, shall be limited to less than twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period.

These limitations will make 326 IAC 2-4.1-1 and 326 IAC 2-7 not applicable.

D.1.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, VOC usage in the railcar wash unit is limited to less than 25 tons of VOC usage per 12 consecutive month period with compliance determined at the end of each month. The VOC usage of each railcar cleaned is determined by the amount of residual product contained in each railcar cleaned, multiplied by the VOC content of that residual product. The residual product in each railcar is captured and recycled and the solvent is a surfactant which is also recycled. The source-wide VOC usage is determined by summing the amount of VOC in each railcar cleaned and will be computed by the following:

$$\sum_{N=1}^{\text{Total railcars cleaned/month}} \text{Residual product/railcar} \times \text{VOC content} = \text{VOC total residual}$$

VOC residual used in conversion table to calculate VOC total

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.4 Record Keeping Requirement

(a) To document compliance with Condition with condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit and the HAP emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount of total and individual HAP content of the residual product in each railcar washed. Records shall include purchase order, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The amount and VOC content of the residual product in each railcar washed. Records shall include purchase order, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(3) The weight percent of the combined and each individual HAP content of the residual product in each railcar washed;

(4) The weight percent VOC content of the residual product in each railcar washed;

(5) The total combined and each individual HAP usage for each month;

(6) The total VOC usage for each month.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the Aauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and VIGO COUNTY AIR POLLUTION CONTROL

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: GATX Corporation
Source Address: 4400 Maple Ave., Terre Haute, Indiana 47804
Mailing Address: 500 W. Monroe St., 41st Floor, Chicago, IL
FESOP Permit No.: F167-24547-00130

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

and VIGO COUNTY AIR POLLUTION CONTROL

103 South 3rd Street
Terre Haute, IN 47807
Phone: 812-462-3433
Fax: 812-462-3447

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name:	GATX Corporation
Source Address:	4400 Maple Ave., Terre Haute, Indiana 47804
Mailing Address:	500 W. Monroe St., 41st Floor, Chicago, IL
FESOP Permit No.:	F167-24547-00130

This form consists of 2 pages **Page 1 of 2**

□	This is an emergency as defined in 326 IAC 2-7-1(12)
X	The Permittee must notify the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), within four (**4**) business hours (**IDEM:** 1-800-451-6027 or 317-233-0178, ask for Compliance Section), (**VCAPC:** 812-462-3433); and
X	The Permittee must submit notice in writing or by facsimile within two (**2**) working days (**IDEM Facsimile Number:** 317-233-6865), (**VCAPC Facsimile Number:** 812-462-3447), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and VIGO COUNTY AIR POLLUTION CONTROL

FESOP Quarterly Report

Source Name: GATX Corporation
Source Address: 4400 Maple Ave., Terre Haute, Indiana 47804
Mailing Address: 500 W. Monroe St., 41st Floor, Chicago, IL
FESOP Permit No.: F167-24547-00130
Facility: Railcar Wash Unit
Parameter: VOC Usage
Limit: Less than 25 tons VOC per 12 consecutive month period with compliance determined at the end of each month

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and VIGO COUNTY AIR POLLUTION CONTROL

FESOP Quarterly Report

Source Name: GATX Corporation
Source Address: 4400 Maple Ave., Terre Haute, Indiana 47804
Mailing Address: 500 W. Monroe St., 41st Floor, Chicago, IL
FESOP Permit No.: F167-24547-00130
Facility: Railcar Wash Unit
Parameter: Combined HAP Usage
Limit: Less than 24.9 tons combined HAP per 12 consecutive month period with compliance determined at the end of each month

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	HAP This Month (tons)	HAP Previous 11 Months (tons)	HAP 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and VIGO COUNTY AIR POLLUTION CONTROL

FESOP Quarterly Report

Source Name: GATX Corporation
Source Address: 4400 Maple Ave., Terre Haute, Indiana 47804
Mailing Address: 500 W. Monroe St., 41st Floor, Chicago, IL
FESOP Permit No.: F167-24547-00130
Facility: Railcar Wash Unit
Parameter: Single HAP Usage
Limit: Each individual HAP is limited to less than 9.9 tons per 12 consecutive month period with compliance determined at the end of each month

YEAR:_____

HAP	Column 1	Column 2	Column 1 + Column 2
	HAP This Month (tons)	HAP Previous 11 Months (tons)	HAP 12 Month Total (tons)
Dichlorobenzene			
Ethylene Glycol			
Acrylic Acid			
Toluene			
Xylenes			
Methanol			
Benzene			
Glycol Ethers			
Methyl Isobutyl Ketone			
Nitrobenzene			
Stryene			
Other (specify):			
Other (specify):			
Other (specify):			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and VIGO COUNTY AIR POLLUTION CONTROL
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: GATX Corporation
Source Address: 4400 Maple Ave., Terre Haute, Indiana 47804
Mailing Address: 500 W. Monroe St., 41st Floor, Chicago, IL
FESOP Permit No.: F167-24547-00130

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality
and Vigo County Air Pollution Control

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name:	**GATX Corporation**
Source Location:	**4400 Maple Ave., Terre Haute, IN 47804**
County:	**Vigo**
SIC Code:	**4789**
Operation Permit No.:	**F167-14957-00130**
Operation Permit Issuance Date:	**August 6, 2002**
Permit Renewal No.:	**F167-24547-00130**
Permit Reviewer:	**Scott Sines**

The OAQ and VCAPC have received an application from GATX Corporation related to the renewal of a FESOP for a stationary railcar cleaning system.

Existing Approvals

The source was issued FESOP No. 167-14957-00130 on August 6, 2002. The source has since received the following approval:

First Administrative Amendment No. 167-19069-00130 issued on June 28, 2004.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Maintenance Attainment
NO_2	Attainment
8-hour Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

(a) Vigo County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air

Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Vigo County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.

(e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(f) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Emission Units

This stationary source consists of the following emission units and pollution control devices:

(a) Railcar Wash Unit, constructed in 2001, consisting of two (2) 1500 gallon tanks and one (1) 200 gallon per minute (gpm) pump, with a maximum capacity of cleaning 12 railcars per day (with a maximum residual volume of 5 gallons per car), exhausting to the ambient air.

(b) Vacuum Pump, constructed in 2001, with a maximum capacity of 270 cubic feet per minute (cfm), exhausting to stack 1.

(c) A flare, constructed in 2002, with a maximum capacity of 15 million (MM) Btu per hour, exhausting to stack 2, used to purge compressed gas, mainly ammonia and liquid propane gas (LPG).

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A pages 1 - 4 of this document for detailed emission calculations.

Permit Level Determination – FESOP

Pursuant to 326 IAC 2-7-1(29), Potential to Emit is defined as “the maximum capacity of a

stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-8. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	PTE (tons/year)
PM	11.79
PM10	11.79*
SO_2	0.53
VOC	118.70**
CO	24.31
NO_X	8.43

* Assume PM10 emissions equal PM emissions.
** VOC emissions are "worst case" from dichlorobenzene.

HAP	PTE (tons/year)
Dichlorobenzene	118.72*
Ethylene Glycol	100.45
Acrylic Acid	95.89
Toluene	78.54
Xylenes	78.54
Methanol	73.06
Benzene	39.48
Butadiene	0.004
Cumene	1.20
Ethylbenzene	3.23
Ethylene Glycol	100.45
Methanol	73.06
Methyl isobutyl ketone	81.54
Naphthalene	1.29
Nitrobenzene	108.67
Phenol	0.08
Styrene	6.24
Toluene	93.95
Vinyl acetate	0.45
Glycol Ethers	90.41
TOTAL	118.72*

* HAP emissions are "worst case" from dichlorobenzene as only one railcar can be cleaned at any one time.

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Pollutant	PTE after controls (tons/year)
PM	11.79
PM10	11.79*
SO_2	0.53
VOC	24.9
CO	24.31
NO_X	8.43
Single HAP	9.9
Combined HAPs	24.9

* Assume PM10 emissions equal PM emissions.

GATX Rail Corporation will limit VOCs to less than twenty-five (25) tons per year through production limits and record keeping. This limit will make 326 IAC 8-1-6 not applicable.

GATX Rail Corporation will limit Hazardous Air Pollutants (HAPs) to the following: less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. These limits will make 326 IAC 2-4.1-1 and 326 IAC 2-7 not applicable.

This existing minor stationary source is not major because the emissions are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This source is a minor source pursuant to the Part 70 Permit program. A FESOP will be issued.

Federal Rule Applicability Determination

The following federal rules are applicable to the source:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this source.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – FESOP section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
GATX Rail Corporation will limit Hazardous Air Pollutant (HAPs) to the following: less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. Therefore operation of the stationary railcar cleaning system will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(c) GATX Rail Corporation is not subject to 326 IAC 5-1-2(2) because it is not located within a five-tenths kilometer radius circle centered at UTM Coordinates Zone 16 East four hundred sixty-four and fifty-two hundredths kilometers North four thousand three hundred sixty-nine and twenty-one hundredths kilometers.

326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter Counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The worst case process weight rate for railcar cleaning is 21.6 pounds per hour (based on dichlorobenzene). Pursuant to 326 IAC 6-3-2(e) the particulate from railcar cleaning operations shall be less than or equal to 0.551 pounds per hour.

326 IAC 6.5-1-2 (Particulate Matter Limitations)
Pursuant to 326 IAC 6.5-1-1(a)(2) the source is not subject to this rule because the potential to emit of particulate matter is less than one hundred (100) tons per year and it has actual particulate matter emissions of less than ten (10) tons per year. Therefore 326 IAC 6.5 does not apply.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
In order to render the requirements of 326 IAC 8-1-6 not applicable, VOC usage in the railcar wash unit is limited to less than 25 tons of VOC usage per 12 consecutive month period with compliance determined at the end of each month. The VOC usage of each railcar cleaned is determined by the amount of residual product contained in each railcar cleaned, multiplied by the VOC content of that residual product. The residual product in each railcar is captured and recycled and the solvent is a surfactant which is also recycled. The source-wide VOC usage is determined by summing the amount of VOC in each railcar cleaned and will be computed by the following:

$$\sum_{N=1}^{\text{Total railcars cleaned/month}} \text{Residual product/railcar} \times \text{VOC content} = \text{VOC total residual}$$

VOC residual used in conversion table to calculate VOC total

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with

the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source=s failure to take the appropriate corrective actions within a specific time period.

Conclusion and Recommendation

The operation of this railcar cleaning system shall be subject to the conditions of the attached proposed FESOP Renewal No. 167-24547-00130. The staff recommends to the Commissioner that this FESOP Renewal be approved.

Appendix A: Emissions Calculations
Air Emissions Calculations for Railcar Cleaning Facility

Company Name: GATX Corporation
Address City IN Zip: 4400 Maple Ave., Terre Haute, IN 47804
Permit Number: F167-24547-00130
Plt ID: 167-00130
Reviewer: Scott Sines
Date: 4/25/07

Air Emissions Calculations for Railcar Cleaning Facility
Hazardous Air Pollutant Emissions From Residual Commodities

Material	HAPs	Density (lb/gal)	Weight % HAPs	Gal/unit	Max Unit/hr	lb HAPs/gal	lb HAPs/hr (potential)	lb HAPs/day (potential)	tons HAPs/yr (potential)
Dichlorobenzene	Dichlorobenzene	10.8	100.00%	5	0.5	10.842	27.11	650.52	118.72
Ethylene Glycol	Ethylene Glycol	9.17	100.00%	5	0.5	9.174	22.94	550.44	100.455
Acrylic Acid	Acrylic Acid	8.76	100.00%	5	0.5	8.757	21.89	525.42	95.8892
Toluene	Toluene	7.17	100.00%	5	0.5	7.1724	17.93	430.34	78.5378
Xylenes	Xylenes	7.17	100.00%	5	0.5	7.1724	17.93	430.34	78.5378
Methanol	Methanol	6.67	100.00%	5	0.5	6.672	16.68	400.32	73.0584
Aromatic Concentrate	Benzene	7.17	50.00%	5	0.5	3.5862	8.966	215.17	39.2689
	Toluene	7.17	6.00%	5	0.5	0.430344	1.076	25.821	4.71227
	Styrene	7.17	6.00%	5	0.5	0.430344	1.076	25.821	4.71227
	Ethylbenzene	7.17	1.00%	5	0.5	0.071724	0.179	4.3034	0.78538
	Xylenes	7.17	1.00%	5	0.5	0.071724	0.179	4.3034	0.78538
Aromatic Hydrocarbons	Ethylbenzene	7.26	3.00%	5	0.5	0.217674	0.544	13.06	2.38353
	Cumene	7.26	1.50%	5	0.5	0.108837	0.272	6.5302	1.19177
	Xylenes	7.26	0.50%	5	0.5	0.036279	0.091	2.1767	0.39726
Brake Fluid	Glycol Ethers	8.8	65.00%	5	0.5	5.719155	14.3	343.15	62.6247
Butyl Phenol	Phenol	7.67	0.10%	5	0.5	0.0076728	0.019	0.4604	0.08402
Diesel	Benzene	7.09	0.50%	5	0.5	0.035445	0.089	2.1267	0.38812
	Xylenes	7.09	0.20%	5	0.5	0.014178	0.035	0.8507	0.15525
Diethylene Glycol Monobutyl Ether	Glycol Ethers	7.91	100.00%	5	0.5	7.90632	19.77	474.38	86.5742
Diethylene Glycol Monoethyl Ether	Glycol Ethers	8.26	100.00%	5	0.5	8.2566	20.64	495.4	90.4098
Ethylene Glycol Monobutyl Ether	Glycol Ethers	7.51	100.00%	5	0.5	7.51434	18.79	450.86	82.282
Gasoline Anitoxidant / Additive	Benzene	7.42	0.01%	5	0.5	0.00074226	0.002	0.0445	0.00813
	Cumene	7.42	0.01%	5	0.5	0.00074226	0.002	0.0445	0.00813
Glycol Ethers	Glycol Ethers	8.26	100.00%	5	0.5	8.2566	20.64	495.4	90.4098
Kerosene	Benzene	6.71	0.02%	5	0.5	0.00134274	0.003	0.0806	0.0147
	Ethylbenzene	6.71	0.10%	5	0.5	0.0067137	0.017	0.4028	0.07352
	Naphthalene	6.71	0.64%	5	0.5	0.04296768	0.107	2.5781	0.4705
	Toluene	6.71	0.18%	5	0.5	0.01208466	0.03	0.7251	0.13233
	Xylenes	6.71	0.65%	5	0.5	0.04363905	0.109	2.6183	0.47785
Methyl Isobutyl Ketone	Methyl Isobutyl Ketone	6.71	100.00%	5	0.5	6.70536	16.76	402.32	73.4237
Mineral Spirits	Benzene	6.51	0.09%	5	0.5	0.00585468	0.015	0.3513	0.06411
	Cumene	6.51	0.00%	5	0.5	6.5052E-05	2E-04	0.0039	0.00071
Mononitrobenzene	Nitrobenzene	9.92	100.00%	5	0.5	9.9246	24.81	595.48	108.674
Petroleum Crude Oil	Benzene	7.09	0.10%	5	0.5	0.007089	0.018	0.4253	0.07762
Petroleum Distillate	Naphthalene	7.51	1.00%	5	0.5	0.07506	0.188	4.5036	0.82191
	Styrene	7.51	1.00%	5	0.5	0.07506	0.188	4.5036	0.82191
	Xylenes	7.51	0.20%	5	0.5	0.015012	0.038	0.9007	0.16438
Printing Ink	Toluene	7.51	1.00%	5	0.5	0.07506	0.188	4.5036	0.82191
	Xylenes	7.51	1.00%	5	0.5	0.07506	0.188	4.5036	0.82191
Resin Plasticizer	Styrene	7.67	33.00%	5	0.5	2.532024	6.33	151.92	27.7257
Solvents	Methyl Isobutyl Ketone	7.42	10.00%	5	0.5	0.74226	1.856	44.536	8.12775
	Toluene	7.42	12.00%	5	0.5	0.890712	2.227	53.443	9.7533
	Xylenes	7.42	10.00%	5	0.5	0.74226	1.856	44.536	8.12775
Styrene-Butadiene Latex Water	Styrene	8.17	0.80%	5	0.5	0.0653856	0.163	3.9231	0.71597
	Butadiene	8.17	0.01%	5	0.5	0.00040866	0.001	0.0245	0.00447
Vinyl Acetate Water Emulsion	Vinyl Acetate	8.34	0.50%	5	0.5	0.0417	0.104	2.502	0.45662
Waste Oil	Benzene	7.09	0.10%	5	0.5	0.007089	0.018	0.4253	0.07762

The calculations cited above based upon continuous railcar cleaning of each individual commodity.

Actual VOC and HAP emissions from the railcar cleaning process will be less than 10 tons per year for each individual HAP, less than 25 tons per year for total HAPs, and less than 25 tons per year for total VOCs. Quantities of railcars and the associated residual commodities cleaned shall recorded and emission reports shall be submitted as required.

Pounds of VOC/gal = Density (lb/gal) x Weight % Organics
Pounds of VOC/hour = Pounds of VOC/gal (lb/gal) x Gal/unit x Max Unit/hr
Pounds of VOC/day = Pounds of VOC/gal (lb/gal) x Gal/unit x Max Unit/hr x 24 hours/day
Tons of VOC/year = Pounds of VOC/gal (lb/gal) x Gal/unit x Max Unit/hr x (8760 hours/year) x (1 ton/2000 lbs)

Appendix A: Emissions Calculations
Air Emissions Calculations for Railcar Cleaning Facility
Volatile Organic Compound/Hazardous Air Pollutant Emissions From Residual Commodities

Company Name: GATX Corporation
Address City IN Zip: 4400 Maple Ave., Terre Haute, IN 47804
Permit Number: F167-24547-00130
Plt ID: 167-00130
Reviewer: Scott Sines
Date: 4/25/07

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Dichlorobenzene	10.8	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.500	10.84	10.84	27.10	650.40	118.70
Ethylene Glycol	9.2	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.500	9.17	9.17	22.94	550.44	100.46
Acrylic Acid	8.8	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.500	8.76	8.76	21.89	525.42	95.89
Toluene	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.500	7.17	7.17	17.93	430.32	78.53
Xylenes	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.500	7.17	7.17	17.93	430.32	78.53
Methanol	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.500	6.67	6.67	16.68	400.32	73.06

Note: The materials listed above are pure solvents and are residual commodities of materials remaining in the railcars before cleaning.

Potential Emissions
The materials cited above are the commodities that would have the highest potential VOC/HAP emissions based upon continuous railcar cleaning of each individual commodity.

All of the above listed materials are 100% HAPs materials. The maximum potential VOC emissions listed above also represent the maximum potential HAP emissions based upon continuous railcar cleaning of each individual commodity.

The emissions from the cleaning of Dichlorobenzene are indicative of the absolute highest VOC and HAP hourly emission rates for the railcar cleaning facility.

Actual VOC and HAP emissions from the railcar cleaning process will be less than 10 tons per year for each individual HAP, less than 25 tons per year for combined HAPs, and less than 25 tons per year for total VOCs. Quantities of railcars and the associated residual commodities cleaned shall recorded and emission reports shall be submitted as required.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations

Air Emissions Calculations for Railcar Cleaning Facility

Company Name: GATX Corporation
Address City IN Zip: 4400 Maple Ave., Terre Haute, IN 47804
Permit Number: F167-24547-00130
Plt ID: 167-00130
Reviewer: Scott Sines
Date: 4/25/07

Air Emissions Calculations for Railcar Cleaning Facility
Air Pollutant Emissions From Flaring Operation
Empty Railcar with Liquefied Petroleum Gas Vapors

Railcar Volume	Railcar Volume	Volume of Liquid LPG in Railcar	Volume of Liquid LPG in Railcar	Mass of Liquid LPG in Railcar	LPG Pressure in Railcar Before Flaring	LPG Pressure in Railcar After Flaring	LPG Flared	Mass LPG Flared	Heat Content of LPG Flared	NOx Emissions		VOC Emissions		SO_2 Emissions		CO Emissions		PM Emissions	
(gal)	(ft^3)	(gal)	(ft^3)	(lb)	(psia)	(psia)	(moles)	(lb)	(Btu)	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
33653	4499.1	0.00	0.00	0.00	100.00	10.00	85.75	4288	7.5E+07	1.01985	4.4669	2.0997	9.1966	0.1212	0.5306	5.5492	24.3054	2.69224	11.792

Gallons / 7.48 = ft^3
Mass of Liquid LPG = Volume Liquid LPG * 4.81 lb/gal
LPG Flared (moles) = ((LPG Pressure Before - LPG Pressure After) * (Railcar Volume - Volume LPG)) / (10.73 x 530 R)
LPG Flared (lb) = LPG Flared (moles) * 50, where 50 is the assumed molecular weight
Heat Content of LPG Flared = LPG Flared (lb) * 17490 Btu/lb
NOx (lb/hr) = (Heat Content LPG / 1000000) * 0.068 / 16 hours, where 0.068 is an emission factor from AP-42, Table 13.5-1
VOC (lb/hr) = (Heat Content LPG / 1000000) * 0.14 / 16 hours, where 0.14 is an emission factor from AP-42, Table 13.5-1
SO_2 (lb/hr) = (0.18 * 0.1 lb SO_2/ 1000 gal LPG) x Railcar Volume / 16 hours is an emission factor from AP-42, Table 1.5-1
CO (lb/hr) = (Heat Content LPG / 1000000) * 0.37 / 16 hours, where 0.37 is an emission factor from AP-42, Table 13.5-1
PM (lb/hr) = (0.4 lb PM/ 1000 gal LPG) x Railcar Volume / 16 hours is an emission factor from AP-42, Table 1.5-1
Tons per Year = lb/hr * ((8760 hrs/yr) / (2000lb/ton))

Excess LPG Emissions from Venting

After flaring a 2% concentration of LPG remains in the railcar at a pressure of 29.7 psia (0.594 psia LPG) and is subsequently vented to the atmosphere.

LPG Pressure in Railcar After Flaring	LPG Pressure in Railcar After Venting	Railcar Volume	Volume of Liquid LPG in Railcar	LPG Vented	Mass LPG Vented	Time Required to Vent each Railcar	LPG Emissions from Venting	
(psia)	(psia)	(ft^3)	(ft^3)	(moles)	(lb)	(hr)	(lb/hr)	(tons/yr)
0.594	0.000	4499.06	0.00	0.4699	23.4965	1	23.5	N/A

LPG vented (moles) = ((LPG Pressure After Flaring - LPG Pressure After Venting) x (Railcar Volume - Volume LPG)) / (10.73 x 530 R)

LPG Vented (lb) = LPG Vented (moles) * 50, where 50 is the assumed molecular weight
LPG (lb/hr) = (Mass LPG Vented / Time Required to Vent)
N/A = Not Applicable

Appendix A: Emissions Calculations
Air Emissions Calculations for Railcar Cleaning Facility

Company Name: **GATX Corporation**
Address City IN Zip: **4400 Maple Ave., Terre Haute, IN 47804**
Permit Number: **F167-24547-00130**
Plt ID: **167-00130**
Reviewer: **Scott Sines**
Date: **4/25/07**

Flare Operation:

LPG: (15 MMBtu/hr)(0.068 lb/MMBtu)(8760 hr/yr)(ton/2000 lb) = **4.47 tons NO_X/year**

(15 MMBtu/hr)(0.37 lb/MMBtu)(8760 hr/yr)(ton/2000 lb) = **24.3 tons CO/year**

NH_3: (0.005 converted to NO_X)(4340 lbs NH_3/day max. amount flared **21.7 lbs NO_X/day**

= **3.96 tons NO_X/year**

METHODOLOGY:
LPG: Refer to calculations, page 3 of 4.
NH_3: AP-42 contains no emission factors for flaring NH_3.
NH_3 flaring calculations are based on Texas Natural Resource Conservation Commission (TNRCC), Flare Sources: Technical Guidance Package for Chemical Sources (printed 1994).

TNRCC guidance document states that NH_3 flaring results in a 99 percent (99%) conversion to nitrogen (N_2) with 0.5 weight percent conversion to NO_X.

Based on a minimum flare pressure of 70 psig (the recommended maximum operating pressure of the flare), the maximum amount of ammonia that can be flared per day is approximately 4,340 pounds per day. This potential flaring rate is based on the chemical properties of ammonia and the following information
- According to GATX personnel the range of vapor pressures for rail cars containing ammonia that will be serviced is one to 10 atmospheres (atm). Some of the railcars may contain a small amount of liquid ammonia, but most of the railcars will contain ammonia vapors only.
- A worst-case estimate of the amount of ammonia to be flared from a railcar is assumed to be a railcar (volume = 4,411 ft^3) with five inches of liquid ammonia in the bottom (approximately 470 gallons or 63 ft^3). Such a railcar will contain the following mass of ammonia:

The mass of vapor space was calculated from the ideal gas law as shown below

NH_3 (lbs/railcar) = (PV/RT) x MW

where: P = vapor pressure (lb/in2)
V = railcar volume (4,411 ft^3)
R = 10.73 (lb/in^2-ft^3)/(lbmol-R)
T = 538K (78°F)
MW = 17 lb NH_3/lbmol NH_3

At 10 atm (147 lb/in^2), the amount of ammonia in the vapor space is approximately 1,910 pounds

The mass of liquid ammonia was calculated from the specific volume of ammonia (0.026 ft^3/lb)

Assuming a liquid volume of 63 ft^3, the amount of liquid ammonia is 2,430 pounds.