

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-01100031-2006**  
Plant Identification Number: **011-00031**  
Permittee: **ACF Industries, LLC**  
Mailing Address: **P.O. Box 547 Huntington, WV 25710**

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Physical Location: Huntington, Cabell County, West Virginia  
UTM Coordinates: 376.20 km Easting • 4253.90 km Northing • Zone 17  
Directions: I-64 West to Exit 11. Right on Hal Greer Boulevard, right on 5th Avenue, left on 24th Street and left on 3rd Avenue. The ACF plant is located on the right side of 3rd Avenue between 24th Street and 22nd Street.  
Renewal Application Date: March 23, 2004

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### Facility Description

ACF Industries consists of railcar welding, fabrication, blasting and painting operations. The fabrication area consists of flame cutting, welding and assembly. The blasting section consists of weld seam, pangborn interior, auto, hand and finish blasting to prepare the interiors and exteriors for painting. Paint is applied on two tracks in the following procession: primary and secondary lining, exterior primer application, finish booth, stencil booth, final touchup, pre-priming application and anti-skid application.

### Emissions Summary

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#### Plantwide Emissions Summary [Tons per Year]

Criteria Pollutants	Potential Emissions	2004 Actual Emissions
Carbon Monoxide (CO)	9.83	0.7376
Nitrogen Oxides (NO <sub>x</sub> )	11.70	1.844
Particulate Matter (PM <sub>10</sub> ) <i>PM<sub>10</sub> is a component of TSP.</i>	97.61	0.1401
Total Particulate Matter (TSP)	390.42	0.1401
Sulfur Dioxide (SO <sub>2</sub> )	0.07	0.0111
Volatile Organic Compounds (VOC)	245.00	0.1014

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Hazardous Air Pollutants	Potential Emissions	2004 Actual Emissions
Single HAP	≤9.9	
Total HAPs	≤24.9	

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 390.42 tons per year of Particulate Matter and 245 tons per year of Volatile Organic Compounds. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, ACF Industries, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emission limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review permit
	45CSR21	Volatile Organic Compounds limits.
	WV Code § 22-5-4(a)(14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2038C	1/4/2006	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing

the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### **Determinations and Justifications**

This is a renewal of the Title V permit. Since the original Title V Permit was issued the facility has been issued a New Source Review Permit, R13-2038C. The facility requested the modification permit in order to be recognized as a minor source for HAPs (less than 9.4 tons of an individual HAP and less than 25.4 tons of aggregate HAPs). Becoming a minor source of HAPs will allow the facility to become exempt from 40 CFR Part 63 Subpart M National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

Permit R13-2038C is in the new boilerplate format and includes all applicable requirements for the facility, including Rule 7 and Rule 21. The Rule 13 permit also includes appropriate monitoring, recordkeeping, and reporting requirements to demonstrate compliance. It has been determined that these conditions were acceptable for Title V purposes and all conditions were carried over into the Title V Permit.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR Part 63 Subpart M National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. Permit R13-2038C exempts this source from this MACT.

40 CFR 64 - The Pre-Priming Application and Anti-Skid Application are subject to emissions limitations but do not utilize control devices to achieve compliance. All other sources utilize control devices to achieve compliance with PM emission limits but have pre-control device emissions less than that required to be considered a major source. Therefore, in accordance with 40 CFR § 64.2(a), CAM is not applicable to this facility

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: January 12, 2006  
Ending Date: February 13, 2006

All written comments should be addressed to the following individual and office:

Bobbie Scroggie  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing

shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

### **Response to Comments**

In response to comments from the facility, the permit was modified to change the UTM coordinates, the type of control system on emission unit ID 003-04 was changed to a water wash control system, and typographical errors were corrected. In addition, the Fact Sheet was modified to change the UTM coordinates and the Emissions Summary Table was revised because new calculations were performed to estimate potential emissions for CO, NO<sub>x</sub>, and SO<sub>2</sub> and these were included.

In response to comments from the USEPA, the permit was modified to include a new requirement, Section 4.4.12, which requires the facility to monitor facility-wide HAP emissions with recordkeeping.