

Fact Sheet



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

Permit Number: **R30-01100031-2010**
Application Received: **August 26, 2010**
Plant Identification Number: **011-00031**
Permittee: **ACF Huntington, Inc**
Mailing Address: **2300 Third Avenue; Huntington WV 25703**

Revised N/A

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.

Facility Description

ACF Huntington, Inc. (SIC Codes: 4011 and 3743) 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

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	9.83	1.113504
Nitrogen Oxides (NO _x)	11.70	1.43825
Particulate Matter (PM ₁₀)	97.61	-
Total Particulate Matter (TSP)	390.42	0.10075
Sulfur Dioxide (SO ₂)	0.07	0.00795
Volatile Organic Compounds (VOC)	245	0.07291

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2009 Actual Emissions
Single HAP	9.4	0.00
Combination of HAPS	24.4	0.00

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

Title V Program Applicability Basis

This facility has the potential to emit 245 tons per year of Volatile Organic Compounds. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, ACF Huntington, Inc. 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 emissions limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	45CSR21	Emissions of VOCs.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
State Only:	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

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, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
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

In addition to formatting and other minor changes, the following changes were made from the previous Title V permit (R30-01100031-2006):

- Condition 3.5.5. was revised to address electronic submittal of the annual certification to the USEPA. The certification shall now only be submitted to the USEPA via e-mail.
- Conditions 3.1.9. and 3.5.10. were added to address greenhouse gas reporting per 45CSR42. All greenhouse gases emitted above the *de minimis* amounts must be reported.

Non-Applicability Determinations

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

40 CFR 63, Subpart MMM-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. Facilities that emit less than 10 TPY of any single HAP and less than 25 TPY of a combination of HAPS are exempt from this subpart per 40CFR§63.3881(b). Condition 4.1.16 of permit R13-2038C sets lower limits, thus exempting this source from this MACT.

40 CFR 64-Compliance Assurance Monitoring. This is the second permit renewal for this facility. The facility was found not to be applicable to CAM at the time of the first renewal. Therefore, a CAM determination is not required.

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: September 23, 2010
Ending Date: October 25, 2010

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

Rex Compston
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

Rex Compston
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.