

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1779-AOP-R2 AFIN: 28-00251

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Little Rock, Arkansas 72219-8913

2. APPLICANT:

American Railcar Industries, Inc.
901 Jones Road
Paragould, Arkansas 72450

3. PERMIT WRITER:

Shawn Hutchings

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Railcar Manufacturer
NAICS Code: 336570

5. SUBMITTALS:

January 19, 2005

6. REVIEWER'S NOTES:

American Railcar Industries, Inc. (ARI) owns and operates a railcar welding and fabrication plant in Paragould, AR. ARI is adding a new railcar painting building which will add 6 new sources to the permit. These sources are SN-12 thru 17. VOC and HAP emissions from the new railcar paint building are combined into a plantwide total for all painting operations.

Since painting operations already exist at the facility, the new painting building is not considered a new major source of HAPs. Once constructed, it will be considered part of the existing major source of HAPs and subject to the Subpart M as such. The emissions from the old and new paint buildings were separated to maintain the emissions of the new building below 250 tpy so that PSD review would not be necessary. With this modification the VOC emissions at the facility are now above 250 tpy and the source is now considered a PSD major source.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

There are no know enforcement issues with the facility.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
 Has the facility undergone PSD review in the past? N
 Is the facility categorized as a major source for PSD? Y
 ≥ 100 tpy and on the list of 28? N
 ≥ 250 tpy all other? Y

PSD Netting

Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
6, 7, 8, 14, 15, 16	HAPs	40 CFR Part 63, Subpart MMMM Surface Coating of Miscellaneous Metal Parts

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit # 1179-AOP-R1	Permit #1779-AOP-R2	Change
PM	20.5	22.2	1.7
PM ₁₀	20.5	22.2	1.7
SO ₂	0.7	0.8	0.1
VOC	229.5	385.6	156.1
CO	11.8	24.8	13.7
NO _x	13.7	29.1	15.4

Plantwide Permitted Emissions (tpy)			
HAP	228.6	341.7	113.1
HDI	0.3	0.3	0
Manganese	0.75	0.75	0
Chromium	0.1	0.1	0
Nickel	0.03	0.03	0

10. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

Non-Criteria Pollutants:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
12 and 13	Emissions based on particulate generated by specific process	Formula	Fabric Filter	99.8	
14, 15, 16	VOC and HAP usage	None	Filter to control overspray particulate		
17	AP-42 for natural gas	Varied	None	N/A	

12. TESTING REQUIREMENTS:

There was no additional testing required in this permit.

13. MONITORING OR CEMS

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

There was no monitoring or CEMS required in this permit.

14. RECORD KEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
6, 7, 8, 14, 15, 16	HAP emissions HDI emissions VOC emissions	228.6 tpy 0.3 tpy 229.5 tpy	Monthly Daily Monthly	Y

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
1-5, 12, 13	5%	Department guidance	Weekly observation
9 and 17	5%	Department Guidance	Natural Gas Combustion

16. DELETED CONDITIONS:

Former SC	Justification for removal
	No conditions were deleted.

17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

List all active permits voided/superceded/subsumed by the issuance of this permit.

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18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Thomas Rheaume, P.E.