



State of Mississippi



AIR POLLUTION CONTROL PERMIT

To Construct Air Emissions Equipment

THIS CERTIFIES

ARI Railcar Services LLC, Brookhaven Facility
113 Boyce Drive
Brookhaven, MS
Lincoln County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: APR 11 2016

Expires:

Permit No. 1620-00054

Agency Interest # 63948

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Other Relevant Documents:

The federal regulations in this permit may be found on-line at <http://ecfr.gpoaccess.gov/> and the State of Mississippi regulations may be found on-line at <http://www.mdeq.state.ms.us/> or a copy of the regulations may be obtained by contacting the Mississippi Department of Environmental Quality, Environmental Permits Division, Post Office Box 2261, Jackson, MS 39225, phone number 601-961-5171. The following regulations were referenced in this permit:

- 11 Miss. Admin. Code Pt. 2, Ch. 1
- 11 Miss. Admin. Code Pt. 2, Ch. 2
- 40 CFR 60 Subpart A General Provisions

To Construct Air Emissions Equipment

ARI Railcar Services LLC, Brookhaven Facility

Subject Item Inventory

Permit Number:1620-00054

Activity ID No.: PER20160001

Subject Item Inventory:

ID	Designation	Description
AI63948	63948	Railcar Inspection and repair
CONT1	AA-001	Open Air Assisted Flare for Car Depressurization and Steam Purge
TRMT1	AA-002	Railcar Steam Cleaning
EQPT1	AA-003	Natural Gas Fired Boiler
ACT2	AA-004	Welding Operations
EQPT3	AA-005	Natural Gas Fired Space Heaters
EQPT4	AA-006	560 Gallon Diesel Fuel Storage Tank

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

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KEY

WDPT = Withdrawal Point

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AI0000063948 (63948) Railcar Inspection and repair:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	VOC	VOC: The permittee shall limit total VOC emissions to no more than 6 tons/yr (TPY). The TPY shall be determined on a 12 month rolling year. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(10)]
L-2	HAP, Total (Limit)	HAP, Total (Limit): The permittee shall limit individual HAPs to no more than 0.2 tons/yr (TPY) and total combined HAPs to no more than 3 TPY. The TPY shall be determined on a 12 month rolling year. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(10)]
L-3	Fuel Combusted	<p>Fuel Combusted: The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations shall be limited as follows:</p> <p>(1) Emissions from installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.</p> <p>(2) Emissions from installations equal to or greater than 10 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship</p> $E = 0.8808 * I^{-0.16667}$ <p>where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. [11 Miss. Admin. Code Pt. 2, Ch. 1. Rule 1.3.D]</p>

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AI0000063948 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	To ensure compliance with permit limits, the permittee shall submit an annual report due by January 31st for the preceding year which includes the following: 1) The total number of railcars flared and steam cleaned in the previous calendar year. 2) The VOC emission rate in tons for the previous year. 3) The individual and total Hazardous Air Pollutant emission rate in tons for the previous year. 4) The amount of natural gas in MCF consumed for the previous year. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(11).]

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]

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AI0000063948 (continued):

Narrative Requirements:

General Condition:

Condition No.	Condition
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials: a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]
Condition No.	Condition
T-8	General Condition:This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]
T-9	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]

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AI0000063948 (continued):

Narrative Requirements:

Condition No.	Condition
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	General Condition: It shall not be a defense for a 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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R.1.1.D(7).]
T-18	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]

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AI0000063948 (continued):

Narrative Requirements:

Condition No.	Condition
T-19	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-20	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-21	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]
T-22	General Condition: Regarding compliance testing: (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time. (b) Compliance testing will be performed at the expense of the permittee. (c) Each emission sampling and analysis report shall include but not be limited to the following: 1. detailed description of testing procedures; 2. sample calculation(s); 3. results; and 4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(6).]
T-23	General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]
T-24	All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(10)]

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CONT0000000001 (AA-001) Open Air Assisted Flare for Car Depressurization and Steam Purge:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The flare must be operated when depressurizing and steam purging rail cars to the flare and is inherent to these processes. For the flare, the permittee shall comply with all applicable requirements of 40 CFR 60.18. [40 CFR 60.18]
L-2		The permittee shall operate the control flare with no visible emissions as determined by EPA Method 22, except for periods not to exceed a total of 5 minutes during any consecutive two (2) hours. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(10)]
L-3		The permittee shall maintain a flare pilot flame when volatile emissions are vented to the flare. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(10)]
L-4		The net heating value of the gas being combusted shall be 300 BTU/scf or greater. [40 CFR 60.18(c)(i)B(ii)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall monitor the presence of the flare pilot flame by one of the following methods: using a thermocouple or any other equivalent device to detect the presence of a flare pilot flame; or visually observe the presence of the flare pilot flame daily. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(11)]
M-2		The permittee shall observe the flare for five minutes once a week during operation. The permittee shall record on a log sheet or electronic data storage the results of the weekly visual observation and whether or not smoking is observed. If smoking is observed, corrective action must be taken. The permittee shall perform a visual observation for a period of two (2) hours using EPA Method 22 immediately after corrections are made to demonstrate compliance with the visible emissions limitations. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(11)]

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CONT0000000001 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall keep records of all maintenance performed on the flare in order to operate the flare in a manner consistent with good air pollution practices to minimize emissions and make said records available on request. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(11)]
R-2	The permittee shall maintain records of all visual observations/tests, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize the emissions, the date and time when visible observations were conducted and the date and time when corrective action was taken. If smoking is observed after a 24 hour period, the permittee shall perform a visual observation using EPA Method 22 with the results made available to MDEQ upon request. The result of all EPA Method 22 tests shall be submitted to MDEQ, annually by January 31 of the following year. If visible emissions exceed 5 minutes during a 2-hour observation period, the permittee shall notify the MDEQ in writing within seven days at the following address: Mississippi Department of Environmental Quality Office of Pollution Control Environmental Compliance and Enforcement P.O. Box 2261 Jackson, MS 39225. [11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(11)]

GENERAL INFORMATION

ARI Railcar Services LLC, Brookhaven Facility
113 Boyce Drive
Brookhaven, MS
Lincoln County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
63948	ARI Railcar Services, LLC	Official Site Name	1/7/2016	
MSR106399	American Railcar Industries Inc, Brookhaven Facility	GP-Construction	6/17/2013	4/4/2016
162000054	American Railcar Industries Inc, Brookhaven Facility	Air-Construction	4/22/2014	4/11/2016
MSR000107003	American Railcar Industries	Hazardous Waste-EPA ID	3/16/2015	1/1/2016
63948	American Railcar Industries, Inc.	Historic Site Name	5/23/2013	1/7/2016
MSR000107003	ARI Railcar Services LLC	Hazardous Waste-EPA ID	1/8/2016	
162000054	ARI Railcar Services LLC, Brookhaven Facility	Air-Construction	4/11/2016	

Basin: Pearl River Basin

Location Description:

GENERAL INFORMATION

Relevant Documents:

The federal regulations in this permit may be found on-line at <http://ecfr.gpoaccess.gov/> and the State of Mississippi regulations may be found on-line at <http://www.mdeq.state.ms.us/> or a copy of the regulations may be obtained by contacting the Mississippi Department of Environmental Quality, Environmental Permits Division, Post Office Box 2261, Jackson, MS 39225, phone number 601-961-5171. The following regulations were referenced in this permit:

11 Miss. Admin. Code Pt. 2, Ch. 1

11 Miss. Admin. Code Pt. 2, Ch. 2

40 CFR 60 Subpart A General Provisions