



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

American Railcar Industries
375 South Gerard Street
Bude, MS
Franklin County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: JUL 13 2011

Expires: JUN 30 2016

Permit No. 0820-00019

Agency Interest # 1655

*** Official MDEQ Permit - Version 1.1 ***

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 Subject Item Inventory
 Permit Number:0820-00019
 Activity ID No.: PER20080001

Subject Item Inventory:

ID	Designation	Description
ACT1	AA-008	Tank Lining Shop; Two (2) Individual Processing Lines (lining application station)
ACT2	AA-014	Low Pressure Gas Railcar Cleaning; Railcars are connected to a Flare via a vent line and the gases are flared.
ACT3	AA-015	Steam Cleaning of Railcars
ACT4	AA-016	Railcar Repair Shop
ACT5	AA-017	Metal Media Shot Blasting equipped with baghouse
ACT6	AA-018	Sand Blasting
ACT7	AA-019	Paint Shop
AI1655	1655	Railcar Repair and Maintenance
EQPT1	AA-001	2.50 MMBTU/hr Natural Gas Fired Air Heater Unit #1
EQPT2	AA-002	4.00 MMBTU/hr Natural Gas Fired Air Heater Unit #2
EQPT3	AA-003	2.50 MMBTU Natural Gas Fired Air Heater Unit #3
EQPT4	AA-004	0.50 MMBTU/hr Natural Gas Fired Air Make-Up Unit #1
EQPT5	AA-005	0.50 MMBTU/hr Natural Gas Fired Air Make-Up Unit #2
EQPT6	AA-006	1.60 MMBTU/hr Natural Gas Fired Air Make-Up Unit #3
EQPT7	AA-007A	Steel shot Blast Unit with Baghouse
EQPT8	AA-020	6.68 MMBTU/hr Natural Gas Fired Boiler Unit #1
EQPT9	AA-021	4.52 MMBTU/hr Natural Gas Fired Boiler Unit #2
EQPT10	AA-022	4.72 MMBTU/hr Natural Gas Fired Space Heaters
EQPT13	AA-025	Ref. No. CH-1, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #1
EQPT14	AA-026	Ref. No. CH-2, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #2
EQPT15	AA-027	Ref. No. CH-3, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #3
EQPT20	AA-007B	Steel shot Blast Unit with Baghouse

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ID	Designation	Description
EQPT22	AA-031	30 HP Natural gas supply (Facility Ref. Air Supply 2)
EQPT23	AA-032	30 HP Natural Gas Supply (Facility Ref. Air Supply 3)
EQPT24	AA-033	30 HP Natural Gas Supply (Facility Ref. Air Supply 4)
EQPT25	AA-034	20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 1)
EQPT26	AA-035	20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 2)
EQPT27	AA-036	20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 3)
EQPT28	AA-037	20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 4)
EQPT29	AA-038	5 HP Cambridge direct gas fired industrial heater (Facility Ref. No Exterior Filtered Gas Fired Heaters #1)
EQPT30	AA-039	5 HP Cambridge direct gas fired industrial heater (Facility Ref. No Exterior Filitered Gas Fired Heaters #2)
EQPT31	AA-030	30 HP Natural gas Supply (Facility Ref. Air Supply 1)
EQPT32	AA-028	Ref. No. CH-4, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #4

Subject Item Groups:

ID	Description	Components
GRPT1	Steel Shot Blast Units with Baghouse	EQPT20 Steel shot Blast Unit with Baghouse
		EQPT7 Steel shot Blast Unit with Baghouse
GRPT2	Storage Tanks	EQPT17 560 gallon Diesel Fuel Storage Tank, Ref. No. T-1
		EQPT18 250 gallon Diesel Fuel Storage Tank, Ref. No. T-2
		EQPT19 250 gallon Gasoline Storage Tank, Ref. No. T-3
GRPT3	Natural Gas Supply	EQPT22 30 HP Natural gas supply (Facility Ref. Air Supply 2)
		EQPT23 30 HP Natural Gas Supply (Facility Ref. Air Supply 3)
		EQPT24 30 HP Natural Gas Supply (Facility Ref. Air Supply 4)
		EQPT31 30 HP Natural gas Supply (Facility Ref. Air Supply 1)
GRPT5	Air Exhaust Fan	EQPT25 20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 1)
		EQPT26 20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 2)
		EQPT27 20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 3)

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ID	Description	Components
GRPT5	Air Exhaust Fan	EQPT28 20 HP Upblast Exhaust Ventilator (Facility Ref No. Air Exhuast Fan 4)
GRPT6	Exterior Filtered Gas Fired Heaters	EQPT29 5 HP Cambridge direct gas fired industrial heater (Facility Ref. No Exterior Filtered Gas Fired Heaters #1)
		EQPT30 5 HP Cambridge direct gas fired industrial heater (Facility Ref. No Exterior Filitered Gas Fired Heaters #2)

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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Facility Requirements

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ACT0000000001 (AA-008) Tank Lining Shop; Two (2) Individual Processing Lines (lining application station):

Narrative Requirements:

Condition

No. Condition

T-1 Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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ACT0000000002 (AA-014) Low Pressure Gas Railcar Cleaning; Railcars are connected to a Flare via a vent line and the gases are flared.:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Hydrogen sulfide	Hydrogen sulfide: The permittee shall not cause or permit the emissions for any gas stream which contains hydrogen sulfide in excess of one (1) grain per 100 standard cubic feet (gr/100 scf) Gas Streams containing hydrogen sulfide in excess of one (1) grain per 100 standard cubic feet shall be incinerated of not less than 1600 Degrees Fahrenheit for a period of not less than 0.5 seconds, or processed in such a manner which is equivalent to or more effective for the removal of hydrogen sulfide. [APC-S-1 4.2.b]
L-2		The permittee shall only operate with the emissions routed to and controlled by the flare. [APC-S-2 II.B(10)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall maintain a flare pilot flame at all times and keep records of all maintenance performed on the flare in order to operate the flare in a manner consistent with good air pollution control practices to minimize emissions. [40 CFR 60.Subpart A]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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ACT0000000003 (AA-015) Steam Cleaning of Railcars:

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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ACT0000000004 (AA-016) Railcar Repair Shop:

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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ACT0000000005 (AA-017) Metal Media Shot Blasting equipped with baghouse:

Narrative Requirements:

Condition

No. Condition

T-1 Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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ACT0000000006 (AA-018) Sand Blasting:

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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ACT0000000007 (AA-019) Paint Shop:

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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AI0000001655 (1655) Railcar Repair and Maintenance:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: Except as otherwise specified, the permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship: $E = 4.1 * p$ (to the power of 0.67), where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. [APC-S-1 Section .3.6(a)]
L-2	Particulate Matter	Particulate Matter: For facility wide emissions, the permittee shall limit particulate matter (PM) to no more than 99.9 tons/yr (TPY). The TPY shall be determined for each consecutive 12-month period. [APC-S-2 II.B(10)]
L-3	Opacity	Opacity: The permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, determined by EPA Reference Method 9, 40 CFR 60, Appendix A. This shall not apply to vision obscuration caused by uncombined water droplets. [APC-S-1 Section 3]
L-4	Particulate Matter (10 microns or less)	Particulate Matter (10 microns or less): For facility wide emissions, the permittee shall limit particulate matter (PM) to no more than 99.9 tons/yr (TPY). The TPY shall be determined for each consecutive 12-month period. [APC-S-2 II.B(10)]
L-5		For Emission Point AA-008 and AA-019, the permittee shall determine the following for each coating and/or solvent used, utilizing data supplied by the manufacturer or by analysis of each coating and/or solvent using EPA Reference Method 24, 40 CFR 60, Appendix A: a) Coating usage b) Solvent Usage c) The percentage of VOCs by weight d) The percentage of each Hazardous Air Pollutants (HAP) e) The density. [APC-S-2 II.B(10)]
L-6		For facility wide emissions, the permittee shall limit total VOC emissions to no more than 99.9 tons/yr (TPY), individual HAP emissions to no more than 9.9 TPY, and total combined HAPs to no more than 24.9 TPY. The TPY shall be determined for each consecutive 12-month period. [APC-S-2 II.B(10)]

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Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For the entire facility, the permittee shall determine the following for PM and/or PM10 emissions:</p> <ul style="list-style-type: none">a) The amount of abrasive blasting medium consumedb) The amount of welding electrodes and/or medium consumed <p>The permittee may utilize data supplied by the manufacturer, or analysis of PM/PM10 emissions by EPA Test Methods 1-5, 40 CFR 60 Appendix A, and/or alternate EPA approved test method(s). [APC-S-2 II.B(10)]</p>

Record-Keeping Requirements:

Particulate Matter:

Condition No.	Condition
R-1	<p>Particulate Matter: To ensure compliance with the PM emission limits, the following will be conducted for Emission Points AA-007 A & B (Group 1) and AA-017. The facility will maintain records of the following:</p> <ul style="list-style-type: none">1) Perform Weekly inspections of the baghouses2) Maintain records of all maintenance performed to maintain proper operation of the control equipment3) Operate and maintain a system for monitoring the pressure drop across the baghouses4) Record the pressure drop for each baghouse system once per workshift and compare to manufacturer's data to ensure that the baghouses are working within the manufacturer's specifications. [APC-S-2 II.B(11)]

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Record-Keeping Requirements:

Particulate Matter (10 microns or less):

Condition No.	Condition
R-2	<p>Particulate Matter (10 microns or less): To ensure compliance with the PM10 emission limits, the following will be conducted for Emission Points AA-007 A & B (Group 1) and AA-017. The facility will maintain records of the following:</p> <ol style="list-style-type: none">1) Perform Weekly inspections of the baghouses2) Maintain records of all maintenance performed to maintain proper operation of the control equipment3) Operate and maintain a system for monitoring the pressure drop across the baghouses4) Record the pressure drop for each baghouse system once per workshift and compare to manufacturer's data to ensure that the baghouses are working within the manufacturer's specifications. [APC-S-2 II.B(11)]

Condition No.	Condition
R-3	<p>The permittee shall maintain sufficient records to document the following for Emissions Points AA-008 and AA-019:</p> <ol style="list-style-type: none">a) The coatings and solvents used the total gallons of each coating and each solvent used during a reporting periodb) The total coating and solvent usage on a monthly basis and in any consecutive 12-month periodc) The VOC and HAP content(s) of each coating and each solvent. A description of the method used to determine the VOC and HAP content shall accompany this datad) The density of each coating and each solvent <p>All records shall be maintained on site by the permittee for a period of five (5) years following the date of such record. The records shall be made available to MDEQ personnel upon request. [APC-S-2 II.B(11)]</p>

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Record-Keeping Requirements:

Condition

No. Condition

R-4 To ensure compliance with the VOC and HAP emissions limits, the following will be conducted for Emission Points AA-008, AA-014, AA-015, and AA-019:

For Emission Points AA-008 and AA-019, the facility will maintain records of the following:

- 1) Each coating that is used during a reporting period
- 2) The total gallons of each coating used in any consecutive 12 month period
- 3) The VOC and HAP content(s) of each coating
- 4) The total VOC, individual HAP, and total HAP emission rates in tons/year for each consecutive 12 month period

For Emission Points AA-014 and AA-015, the facility will maintain records of the following:

- 1) The total number of railcars flared and steam cleaned in any consecutive 12 month period
 - 2) Each railcar pressure
 - 3) The contents of each railcar that is flared
 - 4) The capacity and contents of each railcar steam cleaned
 - 5) The VOC emission rate in tons/yr for each consecutive 12 month period.
- . [APC-S-2 II.B(11)]

R-5 For the entire facility, the permittee shall maintain sufficient records to document:

- a) The amount of abrasive blasting medium consumed on a monthly basis and in each consecutive 12-month period on a rolling basis
 - b) The amount of welding electrodes and/or medium consumed on a monthly basis and in each consecutive 12-month period on a rolling basis
 - c) The total PM and PM10 emission rate in tons per month and tons per year for each consecutive 12-month period on a rolling basis
- . [APC-S-2 II.B(10)]

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Submittal/Action Requirements:

Condition No.	Condition
S-1	<p>To ensure compliance with the VOC and HAP emissions limits, the following will be conducted for Emissions Points AA-008, AA-014, AA-015, & AA-019:</p> <p>For Emission Points AA-008 and AA-019, the facility will submit annual reports of the following to MDEQ:</p> <ol style="list-style-type: none">1) Each coating used2) The total gallons of each coating used in any consecutive 12 month period3) The VOC and HAP content(s) of each coating4) The VOC, individual HAP, and total HAP emission rates in tons/year for each consecutive 12 month period <p>For Emission Points AA-014 and AA-015, the facility will submit annual reports of the following:</p> <ol style="list-style-type: none">1) The total number of railcars flared and steam cleaned in any consecutive 12 month period2) Each railcar pressure3) The contents of each railcar that is flared4) The capacity and contents of each railcar steam cleaned5) The VOC emission rate in tons/yr for each consecutive 12 month period. [APC-S-2 II.B(11)]
S-2	<p>For the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding year. This report shall provide the following:</p> <ol style="list-style-type: none">a) The amount of abrasive blasting medium consumed on a monthly basis and in each consecutive 12-month period on a rolling basisb) The amount of welding electrodes and/or medium consumed on a monthly basis and in each consecutive 12-month periodc) The total PM and PM10 emission rate in tons per month and tons per year for each consecutive 12-month period on a rolling basis <p>. [APC-S-2 II.B(11)]</p>
S-3	<p>General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [APC-S-2 II.B(10)]</p>
S-4	<p>Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [APC-S-2 II.B(11)]</p>

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Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [APC-S-2 V.A]
T-3	General Condition: Solids removed in the course of control of air emissions shall 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 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 10]
T-5	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [APC-S-2 X]
T-6	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board 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-7	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 cause including, but not limited to: (a) 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 required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.C]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this 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 condition of the permit. [APC-S-2 II.B(15)b]

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Narrative Requirements:

Condition No.	Condition
T-9	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]
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [APC-S-2 II.B(15)c]
T-11	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [APC-S-2 II.B(7)]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B]
T-13	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.D]
T-15	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this 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. [APC-S-2 I.D(7)]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ 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 MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [APC-S-2 II.B(15)d]

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Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <ul style="list-style-type: none">(a) routine maintenance, repair, and replacement;(b) use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;(d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or(f) any change in ownership of the stationary source" [APC-S-2 I.D(2)]
T-18	<p>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 this 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. [APC-S-2 II.B(15)a]</p>
T-19	<p>General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [APC-S-2 IX]</p>
T-20	<p>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 constructing or operating without a valid permit. [APC-S-2 II.B(5)]</p>

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Narrative Requirements:

Condition No.	Condition
T-21	<p>General Condition: Emergencies</p> <p>(a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [APC-S-2 II.B(10)]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 Section 10]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

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AI0000001655 (continued):

Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-25	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [APC-S-2 VIII]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000001 (AA-001) 2.50 MMBTU/hr Natural Gas Fired Air Heater Unit #1:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000002 (AA-002) 4.00 MMBTU/hr Natural Gas Fired Air Heater Unit #2:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000003 (AA-003) 2.50 MMBTU Natural Gas Fired Air Heater Unit #3:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000005 (AA-005) 0.50 MMBTU/hr Natural Gas Fired Air Make-Up Unit #2:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000006 (AA-006) 1.60 MMBTU/hr Natural Gas Fired Air Make-Up Unit #3:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000009 (AA-021) 4.52 MMBTU/hr Natural Gas Fired Boiler Unit #2:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000010 (AA-022) 4.72 MMBTU/hr Natural Gas Fired Space Heaters:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000013 (AA-025) Ref. No. CH-1, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #1:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000014 (AA-026) Ref. No. CH-2, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #2:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000015 (AA-027) Ref. No. CH-3, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #3:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

American Railcar Industries
Facility Requirements
Permit Number:0820-00019
Activity ID No.: PER20080001

EQPT0000000032 (AA-028) Ref. No. CH-4, 0.98 MMBTU/hr Natural Gas Fired Curing Heater #4:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1.a]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

GENERAL INFORMATION

American Railcar Industries
375 South Gerard Street
Bude, MS
Franklin County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
1655	American Railcar Industries	Official Site Name	10/1/1984	
2803700019	American Railcar Industries	Air-AIRS AFS	10/12/2000	
MSD069530970	American Railcar Industries	Hazardous Waste-EPA ID	10/12/2000	
082000019	American Railcar Industries	Air-Construction	5/18/1998	
082000019	American Railcar Industries	Air-Title V Operating	4/21/1999	4/1/2004
MSU084183	American Railcar Industries	Water - SOP	10/1/1984	
082000019	American Railcar Industries	Air-Synthetic Minor Operating	4/22/2004	3/31/2009
082000019	American Railcar Industries	Air-Synthetic Minor Operating	7/13/2011	6/30/2016

Basin: South Independent Streams Basin

Location Description:PG- Plant Entrance (General). Data collected by Mike Hardy on 11/17/2005. Elevation 259 feet. Parking lot next to gate.