TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 18, 2010

LaDonna Castañuela, Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087, MC 105
Austin, Texas 78711-3087

Re: ED's Decision on Hearing Requests on Midway Industrial Park, LLC., Air Quality Permit No. 76962
TCEQ Docket No. 2010-2075-AIR

Dear Ms. Castañuela:

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

- Final Draft Permit, including any special provisions or conditions
- Maximum Allowable Emission Rate Table (MAERT)
- The summary of the technical review of the permit application
- The modeling audit memoranda
- The compliance summary of the applicant

If you have any questions, please do not hesitate to call me at extension 2253.

Sincerely,

Douglas M. Brown
Staff Attorney
Environmental Law Division

Enclosure

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT

A PERMIT IS HEREBY ISSUED TO
Midway Industrial Park, L.L.C.
AUTHORIZING THE CONSTRUCTION AND OPERATION OF
Railcar Cleaning Facility
LOCATED AT **Nash, Bowie County, Texas**
LATITUDE 33° 26′ 51″ LONGITUDE 094° 10′ 09″

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]

2. **Voiding of Permit**. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least10 percent of the estimated total cost of the project up to a maximum of $5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]

3. **Construction Progress**. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]

4. **Start-up Notification**. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]

5. **Sampling Requirements**. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]

7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates**. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]

9. **Maintenance of Emission Control**. The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]

10. **Compliance with Rules**. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]

11. This permit may be appealed pursuant to 30 TAC § 50.139.

12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]

13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]

14. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

PERMIT 76962

Date:

For the Commission

SPECIAL CONDITIONS

Permit Number 76962

OPERATING LIMITATIONS AND RESTRICTIONS

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.

2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions

3. The permit holder shall comply with the following requirements when it comes to rail car handling de-heeling:

   A. All rail cars which require cleaning that are located at the site must have all hatches, openings, or vents sealed or closed while waiting to be inspected and cleaned.

   B. All rail cars, except pressurized gas rail cars, ammonia rail cars and hopper cars to be cleaned at this facility shall be de-heeled prior to cleaning. A rail car may be considered de-heeled when its liquid content is less than 0.3 percent of the rail car volume or up to 90 gallons of liquid, whichever is less.

   C. Authorized personnel are allowed to open the rail car man-way in the de-heeling building to check for heel content and fit the man-way with a cleaning device. Prior to opening the rail car, any pressure must be vented to the vapor control system and thermal oxidizer until it is equalized with ambient pressure. Upon opening the man-way a vacuum shall be drawn on the rail car to direct all vapors to the vapor control system. The air flow created by this vacuum system shall achieve a minimum velocity of 200 feet per minute per square foot of surface area of the rail car dome opening face velocity (FV), or create a differential pressure across the rail car opening of 0.007 inches of water. Either the air flow across the face of the opening (FV) or the differential pressure across the opening shall be monitored at all times the rail car dome is opened, unless the cleaning device is installed, to demonstrate compliance with the special condition.

D. If de-heeling is required and the material is placed in a drum or other portable container a vacuum must be pulled during filling so all vapors from the drum or portable container are routed to appropriate control. Drum or container filling shall be performed within a total enclosure or partial enclosure designed and operated with a capture velocity of at least 200 feet per minute at the drum or container vent. The drums or portable containers must be properly closed or sealed during storage and shall be checked daily to insure there are no leaks or odors. Appropriate corrective action must be initiated upon discovery of any leaking drums or containers.

4. The site is limited to cleaning 11,232 general purpose cars, 936 pressure cars, and 936 ammonia transport cars a year, the number of rail cars per hour per compound as listed on the attached Approved Chemical List and any other chemical that complies with the requirements of the chemical flexibility Special Condition. The permit holder shall ensure that the rail car is vented to the vapor control system and thermal oxidizer, and that system is operating properly, prior to beginning the cleaning process.

   Records of the name, molecular weight, and vapor pressure of compound being cleaned; type and volume of rail cars being cleaned; control device configuration used; and time and date of cleaning shall be maintained and updated on a daily basis. Records of the number and type of rail cars cleaned in the previous 12-months and shall be recorded and updated on a monthly basis.

5. Rail car cleaning shall be conducted at the six rail car cleaning racks in the cleaning building as follows, except for the ammonia rail car, pressure rail car, and hopper rail car cleaning, which will occur on a track on the south side of the cleaning building.

   A. Rail cars must be connected to the vapor control system prior to cleaning and the vapor control system and thermal oxidizer must be fully operational.

   B. A minimum vacuum of 5.0 inch water column shall be maintained on the rail car during cleaning. A vacuum/pressure gauge shall be installed in the vapor header line in order to verify a vacuum during cleaning operations. Vacuum shall be monitored during cleaning and recorded at least once every 15 minutes.

   C. All rail cars must be vented during cleaning through the vapor control system. The vapor control system directs the waste gas through the one-stage pre-thermal oxidizer sulfuric acid scrubber, then the thermal oxidizer, then the waste heat recovery system and the post thermal oxidizer caustic scrubber to the plant stack.

D. All rail cars containing ammonia must be vented during cleaning through the two-stage water scrubber, then through the vapor control system.

E. All hopper cars must use a dust filtration system to control dust emissions during cleaning, prior to venting through the vapor control system. The dust filtration system shall have a control efficiency of 0.01 grain per dry standard cubic foot (gr/dscf).

6. All plant equipment except as noted in these special conditions shall be totally enclosed or routed in a closed vent system and be controlled by the vapor control system.

7. The permit holder shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) to measure and record the second stage outlet concentration of ammonia from ammonia (water) scrubber and insure it stays below 10 ppmv on an hourly average basis at all times when the system is in operation.

A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specification Nos. 1 through 9, Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60), Appendix B. If there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division for requirements to be met.

B. Section 1 below applies to sources subject to the quality-assurance requirements of 40 CFR Part 60, Appendix F; section 2 applies to all other sources:

(1) The permit holder shall assure that the CEMS meets the applicable quality-assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1. Relative accuracy exceedances, as specified in 40 CFR Part 60, Appendix F, § 5.2.3 and any CEMS downtime shall be reported to the appropriate TCEQ Regional Manager, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Manager.

(2) The system shall be zeroed and spanned daily, and corrective action taken when the 24-hour span drift exceeds two times the amounts specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B, or as specified by the TCEQ if not specified in Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

Each monitor shall be quality-assured at least quarterly using Cylinder Gas Audits (CGA) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2, with the following exception: a relative accuracy test audit (RATA) is **not** required once every four quarters (i.e., four successive quarterly CGA may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive quarterly audits shall occur no closer than two months.

All CGA exceedances of ±15 percent accuracy indicate that the CEMS is out of control.

C. The monitoring data shall be reduced to hourly average concentrations at least once everyday, using a minimum of four equally-spaced data points from each one-hour period.

D. All monitoring data and quality-assurance data shall be maintained by the source. The data from the CEMS may, at the discretion of the TCEQ, be used to determine compliance with the conditions of this permit.

E. The appropriate TCEQ Regional Office shall be notified at least 30 days prior to any required RATA in order to provide them the opportunity to observe the testing.

F. Quality-assured (or valid) data must be generated when ammonia cars are in the cleaning rack. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that ammonia car cleaning is generating emissions over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded. Options to increase system reliability to an acceptable value, including a redundant CEMS, may be required by the TCEQ Regional Manager.

8. The sulfuric acid scrubber shall operate with the following requirements:

A. The sulfuric acid scrubber shall operate with no less than 99 percent amine removal efficiency on an hourly average.

B. Minimum liquid flow to the sulfuric acid scrubber shall be 30 gallons per minute (gpm) prior to the first stack test performed in accordance with the stack testing

Special Condition. After the first satisfactory stack test, the flow shall be at least equal to that maintained during last satisfactory stack test. The circulation rate shall be monitored and recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

C. The scrubbing solution shall be maintained at or below a pH 4.0 prior to the initial stack test performed in accordance with the stack testing Special Condition. After the stack test has been completed, the pH shall be at or below the average pH maintained during the last satisfactory stack test. The pH shall be continuously analyzed and recorded at least once a minute. Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within ± 0.5 pH unit.

D. Quality assured (or valid) data must be generated when the rail car cleaning facility is operating except during the performance of a daily zero check. Loss of valid data due to periods of monitor breakdown, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the rail car cleaning facility operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

9. The post thermal oxidizer caustic scrubber shall operate with the following requirements:

A. Caustic scrubber shall operate with no less than 99 percent removal efficiency of halogenated compounds on an hourly average.

B. Minimum liquid flow to the caustic scrubbers shall be 35 gallons per minute (gpm) prior to the first stack test performed in accordance with the stack testing Special Conditions. After the first satisfactory stack test, the flow shall be at least equal to that maintained during last satisfactory stack test. The circulation rate shall be monitored and recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

C. The scrubbing solution shall be maintained at or above a pH of 9 prior to the initial stack test performed in accordance with the stack testing Special Conditions. After the stack test has been completed, the pH shall be at or above the average pH maintained during the last satisfactory stack test. The pH shall be continuously analyzed and recorded at least once a minute. Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within ± 0.5 pH unit.

D. Quality assured (or valid) data must be generated when the rail car cleaning facility is operating except during the performance of a daily zero check. Loss of valid data due to periods of monitor breakdown, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the rail car cleaning facility operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

10. The thermal oxidizer shall maintain the VOC concentration in the exhaust gas less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency equal to or greater than 99.9 percent.

The thermal oxidizer firebox exit temperature before the heat recovery system shall be maintained at not less than 1800°F. Exhaust oxygen concentration must not be less than 3 percent while waste gas is being fed into the thermal oxidizer prior to initial stack testing. After the initial stack test has been completed, the six minute average temperature and six minute average oxygen concentration shall be at least greater than the respective hourly average maintained during the most recent satisfactory stack testing required by the stack testing special conditions. The thermal oxidizer shall employ low NO_x burners with 0.06 pounds of NO_x per million British thermal units or less.

The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the thermal oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and

maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5°C.

Quality assured (or valid) data must be generated when the thermal oxidizer is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the thermal oxidizer is operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

11. A blower system shall be installed which will produce a vacuum during all tank truck loading operations. The blower system shall exhaust to the vapor control system and thermal oxidizer at all times loading is in progress. During loading the vapor control system and thermal oxidizer must be operating properly. A pressure/vacuum gauge shall be installed on the suction side of the loading rack blower system adjacent to the truck being loaded to verify a vacuum in that vessel. Loading shall not occur unless there is a vacuum of at least 1.5 inch water column being maintained by the vacuum-assist blower and vapor collection system when loading trucks. The vacuum shall be recorded every 15 minutes during loading.

12. Each tank truck shall pass vapor-tight testing every 12 months using the methods described in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subpart XX. The permit holder shall not allow a tank truck to be filled unless it has passed a leak-tight test within the past year as evidenced by a certificate which shows the date the tank truck last passed the leak-tight test required by this condition and the identification number of the tank truck.

LEAK DETECTION AND REPAIR PROGRAMS

13. Piping, Valves, Connectors, Pumps, and Compressors in Volatile Organic Compounds (VOC) Service - 28M

    A. These conditions shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.5 pounds per square inch, absolute (psia) at 100°F or at maximum process operating temperature if less than 100°F or (2) where the operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

The exempted components may be identified by one or more of the following methods:

(1) piping and instrumentation diagram (PID);
(2) a written or electronic database or electronic file;
(3) color coding;
(4) a form of weatherproof identification; or
(5) designation of exempted process unit boundaries.

B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.

C. New and reworked underground process pipelines shall contain no buried valves-such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.

D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in subparagraph A above. If an unsafe-to-monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe-to-monitor times. A difficult-to-monitor component for which quarterly monitoring is specified may instead be monitored annually.

E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period: the line or valve must have a cap, blind flange, plug, or second valve installed; or the permit holder shall verify that there is no leakage from the open-ended line or valve. The open-ended line or valve shall be monitored on a weekly basis in accordance with the applicable NSR permit condition for fugitive emission monitoring except that a leak is defined as any VOC reading greater than background. Leaks must be repaired by the next calendar day or a cap, blind flange, plug, or second valve must be installed on the line or valve. The results of this weekly check and any corrective actions taken shall be recorded.

F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed weekly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR Part 60, Appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs are being monitored, the response factor shall be calculated for the average composition of the process fluid. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. If a response factor less than 10 cannot be achieved using methane, **then** the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

G. Except as may be provided for in the special conditions of this permit, all pump, compressor and agitator seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. Seal systems that prevent emissions may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure or seals degassing to vent control systems kept in good working order.

Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.

H. Damaged or leaking valves, connectors, compressor seals, agitator seals, and pump seals found to be emitting VOC in excess of 10,000 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made withing 5 days. Records of the first attempt to repair shall be maintained. Every reasonable effort shall be made to repair a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

I. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator's log or equivalent.

J. Fugitive emission monitoring required by an applicable New Source Performance Standard (NSPS), 40 CFR Part 60, or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS), 40 CFR Part 61, may be used in lieu of Items F through I of this condition.

K. Compliance with the requirements of this condition does not assure compliance with requirements of NSPS or NESHAPS and does not constitute approval of alternate standards for these regulations.

14. All valves and pumps in light liquid service in the cleaning and de-heeling buildings must be sealess.

INITIAL DEMONSTRATION OF COMPLIANCE

15. The permit holder shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the EPN TO-1, such as, pH, circulation rate, temperature, exhaust gas flowrate/concentration etc. from each of the sulfuric acid scrubber, water scrubber, and caustic scrubbers, to demonstrate compliance with the MAERT. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60) testing which must have EPA approval shall be submitted to the TCEQ OCE, Compliance Support Division.

A. The appropriate TCEQ Regional Office shall be notified not less than 45 days prior to sampling. The notice shall include:

(1) Proposed date for pretest meeting.
(2) Date sampling will occur.
(3) Name of firm conducting sampling.
(4) Type of sampling equipment to be used.
(5) Method or procedure to be used in sampling.
(6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.
(7) Operate at maximum production rate, simultaneously degassing of six rail cars to maintain the design temperature, during the sampling period.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. The TCEQ Regional Director or the TCEQ Office of Compliance and Enforcement (OCE), Compliance Support Division must approve any deviation from specified sampling procedures.

B. Air contaminants emitted from the EPN TO-1 to be tested for include (but are not limited to) VOC, NO_x, CO, NH_3, and HCl. Inlet and outlet concentrations of amines must be evaluated for the sulfuric acid scrubber. Inlet and outlet concentrations of halogenated compounds must be evaluated for the caustic scrubbers.

C. Sampling shall occur within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities and at such other times as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate regional office.

D. The facility being sampled shall be challenged with a maximum rail car cleaning relevant to the control being evaluated under the minimum operating condition parameters necessary to assure the required control. For the thermal oxidizer the temperature, waste gas flow rate, supplemental fuel flow rate and oxygen should be evaluated. For the scrubbers the temperature, scrubber liquid circulation rate and pHs should be evaluated. Vacuum on rail cars being cleaned should be noted and recorded during testing. These conditions/parameters and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.

During subsequent operations, if the rail car cleaning involves chemicals or flows that would exceed the levels previously tested; stack sampling shall be performed at the new operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region. The facility may submit test plans and conduct testing to adjust minimal operating conditions in accordance with this special condition.

E. Copies of the final sampling report shall be forwarded to the offices below within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions entitled "Chapter 14, Contents of Sampling Reports" of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the appropriate TCEQ Regional Office
One copy to each local air pollution control program

16. The permit holder shall use a velocimeter to verify a minimum of 200 feet per minute man-way inlet velocity at the inlet of the railcar to verify the 100% capture for Permanent Total Enclosures (PTEs) per the Environmental Protection Agency Method 204. This test must be conducted once per year while cleaning six rail cars including hopper cars. In lieu of velocimeter readings, the permit holder may monitor the differential pressure across the rail car dome opening and ensure that the vacuum is equal to or greater than 0.007 inches of water.

OPTIONAL OPERATIONS CHEMICAL FLEXIBILITY

17. Except as provided for below, the compounds that maybe cleaned out and potentially emitted in the rail car cleaning facility are limited to those identified in the permit application Chemicals List. Rail cars containing chemicals not on the Chemical List may be cleaned if the following requirements are met.

A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated in accordance with the following methods, as documented in the permit application sumbmitted September 2005: AP-42 emission factors and equations to determine tank and loading emissions; TCEQ fugitive emission factors with appropriate control as identified in the guidance document, "Equipment Leak Fugitives" to determine piping fugitive emissions. The calculated ER shall not exceed the maximum allowable emissions rate at any emission point.

B. The Effect Screening Level (ESL) for the material shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.

C. The total emissions of any compound from all emission points in this permit must satisfy one of the following conditions:

(1) The total maximum ER from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m^3; or

(2) Additional compounds may be handled if the new chemical has an equal or lower vapor pressure, equal or lower molecular weight, and an equal or higher published 30-minute ESL than a chemical already included on the attached approved list. The new chemical must be controlled as required for the approved chemical with which it is being compared. The new chemical must be controlled as required by the conditions of the permit and these Special Conditions.

For compounds with a vapor pressure greater than 40 pounds per square inch, absolute (psia) at 95° Fahrenheit, a vapor pressure of 40 psia may be substituted when evaluating and comparing new compounds.

The permit holder in lieu of using the comparison above may elect to meet the following limitation for new chemicals handled in the control system.

$(ER_{new}$ (lb/unit cleaned) x ER_m [$\mu g/m^3$] / [lb/hr]) + ER_{fug}) / CT (hrs) x Units simultaneously cleaned $\leq ESL_{new}$

Where:

ER_{new} = the emission rate of the new compound in pounds per unit cleaned

ER_m = the modeled 1 pound per hour emission rate (6.72 $\mu g/m^3$)

ER_{fug} = the modeled fugitive emission impact (0.0854 $\mu g/m^3$)

CT = the cleaning cycle time for the cleaning process in hours (assumed to be 1 hour unless longer time applies)

Units simultaneously cleaned equals the number of rail cars of a single chemical cleaned simultaneously. In lieu of an actual number for General Purpose rail car cleaning this may be assumed to be six, and for Pressure Ammonia and Hopper rail car cleaning it may be assumed to be one which represents the maximum capability of the system)

ESL_{new} = the short-term effects screening level of the new compound in $\mu g/m^3$.

The emission rate per unit cleaned for the new chemical will be calculated based on the formula:

ER_{new} = n x MWT (This will give the total emissions in pounds per unit cleaned.)

Where:

n = the lb-mole of material contained in the railcar calculated by the formula n = PV / RT

P = the vapor pressure of the new chemical a t100°F in psia

V = is the volume of the rail car in cubic feet (to convert from gallons the factor 1/7.4805 will be used.)

R = is the gas constant (10.73 psia ft^3 / lb-mole °R

T = is the temperature in degrees Rankine (°R normally is 559.67°R at 100°F)

MWT = the molecular weight in lb/lb-mole

D. The permit holder shall maintain records of the information below and the demonstrations in steps A though C above. The following documentation is required for each compound:

(1) Chemical name(s), composition, and chemical abstract registry number if available.

(2) True vapor pressure at maximum hourly and annual average storage temperature.

(3) Molecular weight.

(4) Storage tanks, loading areas, and fugitive areas where the material is to be handled and the emission control device to be utilized.

(5) Date new compound handling commenced.

(6) Material Safety Data Sheet.

(7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities.

CHEMICALS LIST AND RATE LIMITS

Name	Car Type	Chemical State	Railcars per hour
Acetaldehyde	GP	Liquid	1
Acetamide	GP	Liquid	6
Acetic Acid	GP	Liquid	6
Acetic Anhydride	GP	Liquid	6
Acetone	GP	Liquid	6
Acetonitrile	GP	Liquid	6
Acetophenone	GP	Liquid	6
Acetyl Chloride	GP	Liquid	6
Acrolien	GP	Liquid	6
Acrylamide	GP	Liquid	6
Acrylic Acid	GP	Liquid	6
Acrylonitrile	GP	Liquid	6
Adipic Acid	GP	Liquid	6
Adiponitrile	GP	Liquid	6
Allyl Alcohol	GP	Liquid	6
Allyl Chloride	GP	Liquid	6
Ammonia	PR	Gas	1
Amyl Acetate	GP	Liquid	6
Amyl Alcohol	GP	Liquid	6
Amyl Phenol p-tert	GP	Liquid	6
Aniline	GP	Liquid	6
Anisidine (p)	GP	Liquid	6
Anisole	GP	Liquid	6
Asphalt	GP	Liquid	6
Atrazine	HP	Solid	6
Benzaldehyde	GP	Liquid	6
Benzene	GP	Liquid	6
Benzoic Acid	GP	Liquid	6
Benzoyl Chloride	GP	Liquid	6
Benzyl Alcohol	GP	Liquid	6
Biphenyl	GP	Liquid	6
Bromobenzene	GP	Liquid	6
Butadiene (1,3-)	PR	Gas	1
Butane	PR	Gas	1
Butene (2-)	PR	Gas	1
Butene (1-)	PR	Gas	6
Butyl Acetate (p-tert)	GP	Liquid	6
Butyl Acetate (n)	GP	Liquid	6
Butyl Acetate (sec-)	GP	Liquid	6
Butyl Acrylate	GP	Liquid	6
Butyl Alcohol (n)	GP	Liquid	6
Butyl Chloride	GP	Liquid	6
Butyl Phenol (o-tert)	GP	Liquid	6
Butyl Phenol (p-tert)	GP	Liquid	6
Butylamine (tert)	PR	Gas	6
Butyraldehyde	PR	Gas	6

CHEMICALS LIST AND RATE LIMITS

Name	Car Type	Chemical State	Railcars per hour
Butyric Acid	GP	Liquid	6
Butyronitrile	GP	Liquid	6
Calcium Chloride	HP	Solid	6
Caprolactum	GP	Liquid	6
Carbaryl (Naphthyl-N-Methyl-Carrbamate)	HP	Solid	6
Carbon Disulfide	GP	Liquid	6
Carbon Tetrachloride	GP	Liquid	6
Chlorobenzene	GP	Liquid	6
Chlorobenzilate	GP	Liquid	6
Chloroform	GP	Liquid	6
Chlorophenol (m)	GP	Liquid	6
Chlorophenol (o)	GP	Liquid	6
Chlorophenol (p)	HP	Solid	6
Chlorosulfonic Acid	GP	Liquid	6
Chlorotoluene	GP	Liquid	6
Creosote	GP	Liquid	6
Cresol-m	GP	Liquid	6
Cresol-o	HP	Solid	6
Cresol-p	HP	Solid	6
Cresylic Acid	GP	Liquid	6
Crotonaldehyde	GP	Liquid	6
Cumene	GP	Liquid	6
Cyclohexane	GP	Liquid	6
Cyclohexanol	HP	Solid	6
Cyclohexanone	GP	Liquid	6
Cyclohexene	GP	Liquid	6
Cyclopentane	GP	Liquid	6
Decanol	GP	Liquid	6
Diacetone Alcohol	GP	Liquid	6
Diazinon	HP	Solid	6
Dibutyl Phthalate	GP	Liquid	6
Dichloroaniline (2,5-)	HP	Solid	6
Dichloroaniline (3,4-)	HP	Solid	6
Dichlorobenzene (m)	GP	Liquid	6
Dichlorobenzene (o)	GP	Liquid	6
Dichlorobenzene (p)	HP	Solid	6
Dichloroethylene (1, and 1,2)	GP	Liquid	6
Dichloropropene (1,3)	GP	Liquid	6
Dicyclopentadiene	HP	Solid	6
Diesel oil	GP	Liquid	6
Diethanolamine	GP	Liquid	6
Diethyl Sulfate	GP	Liquid	6
Diethyl Sulfide	GP	Liquid	6
Diethylamine	GP	Liquid	6
Diethylaniline	GP	Liquid	6

CHEMICALS LIST AND RATE LIMITS

Name	Car Type	Chemical State	Railcars per hour
Diglycolamine	GP	Liquid	6
Diisobutyl Ketone	GP	Liquid	6
Diisobutylamine	GP	Liquid	6
Diisobutylene	GP	Liquid	6
Diisopropanolamine	HP	Solid	6
Diisopropyl Amine	GP	Liquid	6
Dimethyl Acetamide	GP	Liquid	6
Dimethyl Phosphorochloridothioate	GP	Liquid	6
Dimethyl Sulfate	GP	Liquid	6
Dimethyl Terephthalate	HP	Solid	6
Dimethylamine	PR	Gas	1
Dimethylaminoethyl Methacrylate	GP	Liquid	6
Dimethylaniline (N,N)	GP	Liquid	6
Dinitrotoluene	HP	Solid	6
Dioxane	GP	Liquid	6
Diphenylamine	HP	Solid	6
Dipropylene Glycol	GP	Liquid	6
Ditridecyl Phthalate	GP	Liquid	6
Epichlorohydrin	GP	Liquid	6
Ethanol	GP	Liquid	6
Ethanolamine	GP	Liquid	6
Ethyl Acetate	GP	Liquid	6
Ethyl Acrylate	GP	Liquid	6
Ethyl Amyl Ketone	GP	Liquid	6
Ethyl Chloride	PR	Gas	1
Ethyl Ether	GP	Liquid	6
Ethyl Silicate	GP	Liquid	6
Ethylamine	PR	Gas	1
Ethylbenzene	GP	Liquid	6
Ethylene	PR	Gas	1
Ethylene Dichloride	GP	Liquid	6
Ethylene Glycol	GP	Liquid	6
Ethylene Oxide	PR	Gas	1
Formaldehyde (37% solution)	GP	Liquid	6
Formalin (10% Formaldehyde 37%)	GP	Liquid	6
Formic Acid	GP	Liquid	6
Furan	GP	Liquid	6
Furfural	GP	Liquid	6
Glycerine	GP	Liquid	6
Heptane	GP	Liquid	6
Hexachlorocyclopentadiene	GP	Liquid	6
Hexamethylene Diisocyanate	GP	Liquid	6
Hexane	GP	Liquid	6
Hexanol	GP	Liquid	6
Hexene	GP	Liquid	6

CHEMICALS LIST AND RATE LIMITS

Name	Car Type	Chemical State	Railcars per hour
Hexylene Glycol	GP	Liquid	6
Hydrazine	GP	Liquid	6
Hydrogen Chloride	PR	Gas	1
Hydrogen Peroxide	GP	Liquid	6
Hydroxyethyl Acrylate	GP	Liquid	6
Isoamylene	PR	Gas	1
Isobutane	PR	Gas	1
Isobutanol	GP	Liquid	6
Isobutyl Acetate	GP	Liquid	6
Isobutyl Acrylate	GP	Liquid	6
Isobutyl Isobutyrate	GP	Liquid	6
Isobutylene	PR	Gas	1
Isobutyraldehyde	GP	Liquid	6
Isobutyric Acid	GP	Liquid	6
Isooctyl Alcohol	GP	Liquid	6
Isophorone	GP	Liquid	6
Isopropyl Acetate	GP	Liquid	6
Isopropyl Alcohol	GP	Liquid	6
Isopropyl Chloride	GP	Liquid	6
Isopropyl Ether	PR	Gas	6
Isopropylamine	GP	Liquid	6
Kerosene	GP	Liquid	6
Liquid Petroleum Gas	PR	Gas	1
Lube Oil	GP	Liquid	6
Malathion	GP	Liquid	6
Methacrylic Acid	GP	Liquid	6
Methanol	GP	Liquid	6
Methyl Acetate	GP	Liquid	6
Methyl Acrylate	GP	Liquid	6
Methyl Amyl Alcohol	GP	Liquid	6
Methyl Chloride	GP	Liquid	1
Methyl Chloroform	GP	Liquid	6
Methyl Ethyl Ketone	GP	Liquid	6
Methyl Formate	GP	Liquid	6
Methyl Isobutyl Ketone	GP	Liquid	6
Methyl Methacrylate	GP	Liquid	6
Methyl Propyl Ketone	GP	Liquid	6
Methyl Pyrrolidone	GP	Liquid	6
Methyl Styrene (alpha)	GP	Liquid	6
Methyl t-Butyl Ether	GP	Liquid	6
Methylamine	GP	Liquid	1
Methylene Chloride	GP	Liquid	6
Methylenedianiline	GP	Liquid	6
Methyllactonitrile	GP	Liquid	6
Metolachlor	GP	Liquid	6
Naphtha	GP	Liquid	6

CHEMICALS LIST AND RATE LIMITS

Name	Car Type	Chemical State	Railcars per hour
Napthalene	GP	Liquid	6
Napthenic Acid	HP	Solid	6
Nitropropane (1-)	GP	Liquid	6
Nitropropane (2-)	GP	Liquid	6
Octane	GP	Liquid	6
Pentadiene (1,3-)	GP	Liquid	6
Pentane (n)	PR	Gas	6
Pentene. (1-)	PR	Gas	6
Perchloroethylene	GP	Liquid	6
Phenol	GP	Liquid	6
Phenylenediamine (o-)	GP	Liquid	6
Phosphoric Acid	GP	Liquid	6
Phthalic Anhydride	GP	Liquid	6
Picoline (2-)	GP	Liquid	6
Picoline (3-)	GP	Liquid	6
Picoline (4-)	GP	Liquid	6
Pinene, alpha	GP	Liquid	6
Piperazine	GP	Liquid	6
Polypropylene Glycol	GP	Liquid	6
Potassium Hydroxide	HP	Solid	6
Propane	PR	Gas	1
Propionaldehyde	PR	Gas	6
Propionic Acid	GP	Liquid	6
Propionitrile	GP	Liquid	6
Propyl Acetate	GP	Liquid	6
Propyl Alcohol	GP	Liquid	6
Propyl Chloride	GP	Liquid	6
Propylamine	GP	Liquid	6
Propylene	PR	Gas	1
Propylene Carbonate	GP	Liquid	6
Propylene Dichloride	GP	Liquid	6
Propylene Glycol	GP	Liquid	6
Propylene Oxide	PR	Gas	6
Pseudocumene	GP	Liquid	6
Pyridine	GP	Liquid	6
Sodium Aluminate	HP	Solid	6
Sodium Borohydride	HP	Solid	6
Sodium Hydroxide	HP	Solid	6
Styrene	GP	Liquid	6
Sulfur	HP	Solid	6
Terephthalic Acid	HP	Solid	6
Toluene	GP	Liquid	6
Toluene Diisocyanate (2,4-)	GP	Liquid	6
Toluene Diisocyanate (2,6-)	GP	Liquid	6
Toluidine (m-)	GP	Liquid	6
Toluidine (o-)	GP	Liquid	6

CHEMICALS LIST AND RATE LIMITS

Name	Car Type	Chemical State	Railcars per hour
Toluidine (p-)	HP	Solid	6
Trichlorobenzene (1,2,4)	GP	Liquid	6
Trichloroethane (1,1,1-)	GP	Liquid	6
Trichloroethane (1,1,2-)	GP	Liquid	6
Trichloroethylene	GP	Liquid	6
Trichlorofluoromethane	GP	Liquid	6
Tridecyl alcohol	GP	Liquid	6
Triethanolamine	GP	Liquid	6
Triethylamine	GP	Liquid	6
Triethylene Glycol	GP	Liquid	6
Triethylene Tetra Amine	GP	Liquid	6
Trimethylamine	PR	Gas	1
Trimethylphenol (2,4,6-)	HP	Solid	6
Turpentine	GP	Liquid	6
Vegetable Oil	GP	Liquid	6
Vinyl Acetate	GP	Liquid	6
Vinyl Chloride	PR	Gas	1
Xylene (m)	GP	Liquid	6
Xylene (o)	GP	Liquid	6
Xylene (p)	GP	Liquid	6
Zinc Bromide	HP	Solid	6

GP- General Purpose Railcar
HP- Hopper Railcar
PR- Pressurized Railcar

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Flexible Permit Number 76962

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
TO-1	Thermal Oxidizer	NO_x	0.98	4.29
		CO	1.36	5.60
		SO_2	0.04	0.17
		PM	0.20	0.89
		VOC	2.12	9.29
		NH_3	0.01	0.04
		HCl	0.21	0.92
CLE-1	Cleaning Building Vent Exhaust (4)	VOC	0.01	0.01
DEH-1	Deheeling Building Vent Exhaust (4)	VOC	0.01	0.01
WWT-1	Wastewater Treatment Fugitives Emissions (4)	VOC	1.41	2.65

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM - particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$
PM_{10} - particulate matter equal to or less than 10 microns in diameter
$PM_{2.5}$ - particulate matter equal to or less than 2.5 microns in diameter
CO - carbon monoxide
HCl - hydrogen chloride
NH_3 - ammonia

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

(4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.

Construction Permit
Source Analysis & Technical Review

Company	**Midway Industrial Park LLC**	Permit Number	**76962**
City	**Nash**	Project Number	**118307**
County	**Bowie**	Account Number	**N/A**
Project Type	**Initial**	Regulated Entity Number	**RN104761606**
Project Reviewer	**Ms. Lourdes C. Rosenberg, E.I.T.**	Customer Reference Number	**CN602913634**
Site Name	**Rail Car Cleaning Facility**		

Project Overview

On September 22, 2005 Midway Industrial Park, LLC., submitted an application to construct a railcar cleaning facility in Nash, Bowie County. Midway Industrial Park, LLC., would like to have chemical flexibility in the authorization, thus making this permit a flexible permit but it will not have any associated emission caps. During the public notice period our agency received requests from concerned citizens to hold a hearing for Midway Industrial Park, LLC. Requests were also received by state officials to hold a public meeting with the concerned citizens as well. A public meeting was held on November 1, 2007. At this meeting representatives for Air Permits Division, Environmental Law Division, Office of Public assistance, Midway Industrial Park, LLC., and concern citizens were in attendance. On November 2008 the company made some modifications to the representations that would result in a more efficient operation. These changes were incorporated into the permit conditions and maximum allowable rate table. After review of the application and consideration of public comments received to date, the Air Permits Division and the Tyler Regional Office recommend issuance of the new construction application.

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	**December 22, 2008**
Compliance period:	**September 1, 2003 to August 31, 2008**
Site rating & classification:	**3.01 and Average**
Company rating & classification:	**3.01 and Average**
If the rating is 40<RATING<45, what was the outcome, if any, based on the findings in the formal report:	**N/A**
Has the permit changed on the basis of the compliance history or rating?	**No**

Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement	
39.403	Is Public Notice Required?	**Yes**
	If no, give reason:	**N/A**
	Date Application Received:	**September 22, 2005**
	Date Administratively Complete:	**September 27, 2005**
	Small Business Source?	**No**
	Date Leg Letters mailed:	**September 28, 2005**
39.603	Date Published:	**October 18, 2005**
	Publication Name:	***Texarkana Gazette***
	Pollutants:	**organic compounds, nitrogen oxides, sulfur dioxide, carbon monoxide, hydrogen chloride, ammonia, and particulate matter**
	Date Affidavits/Copies Received:	**October 26, 2005**
	Is bilingual notice required?	**Yes**
	Language:	**Spanish**
	Date Published:	**A diligent search was made by the company and no bilingual paper was found in the municipality or county where the facility is to be constructed.**
	Publication Name:	***N/A***

Rule Citation	Requirement	
	Date Affidavits/Copies Received:	**N/A**
	Date Certification of Sign Posting / Application Availability Received:	**November 21, 2005**
39.604	Public Comments Received?	**Yes**
	Hearing Requested?	**Yes**
	Meeting Request?	**Yes**
	Date Meeting Held:	**November 1, 2007**
	Date Response to Comments sent to OCC:	**November 18, 2010**
	Request(s) withdrawn?	**No**
	Date Withdrawn:	**N/A**
	Consideration of Comments:	**Yes**
	Is 2nd Public Notice required?	**Yes**
39.419	If no, give reason:	**Comments were received during the 1st PN Comment period**
	Date 2nd Public Notice Mailed:	**6/2/09**
	Preliminary Determination:	**6/16/09**
39.603	Date Published:	**6/16/09**
	Publication Name:	***Texarkana Gazette***
	Pollutants:	**organic compounds, nitrogen oxides, sulfur dioxide, carbon monoxide, hydrogen chloride, ammonia, and particulate matter**
	Date Affidavits/Copies Received:	**6/22/09**
	Is bilingual notice required?	**Yes**
	Language:	**Spanish**
	Date Published:	**A diligent search was made by the company and no bilingual paper was found in the municipality or county where the facility is to be constructed.**
	Publication Name:	***N/A***
	Date Affidavits/Copies Received:	**N/A**
	Date Certification of Sign Posting / Application Availability Received:	**July 21, 2009**
	Public Comments Received?	**No**
	Meeting Request?	**No**
	Date Meeting Held:	**N/A**
	Hearing Request?	**No**
	Date Hearing Held:	**To be determined**
	Request(s) withdrawn?	**No**
	Date Withdrawn:	**N/A**
	Consideration of Comments:	**Yes**
39.421	Date RTC, Technical Review & Draft Permit Conditions sent to OCC:	**November 18, 2010**
	Request for Reconsideration Received?	
	Final Action:	
	Are letters Enclosed?	

Construction Permit & Amendment Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.111(a)(2)(G)	Is the facility expected to perform as represented in the application?	**Yes**
116.111(2)(A)(i)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act?	**Yes**
116.111(2)(B)	Emissions will be measured using the following method:	**Yes, Stack Testing Special Condition Number 15**
	Comments on emission verification:	**N/A**
116.111(2)(D)	Subject to NSPS?	**No**
	Subparts **N/A**	
116.111(2)(E)	Subject to NESHAPS?	**No**
	Subparts **N/A**	
116.111(2)(F)	Subject to NESHAPS (MACT) for source categories?	**No**
	Subparts **N/A**	
116.111(2)(H)	**Nonattainment review applicability:** This facility is located in an attainment county, thus non-attainment review does not apply.	
116.111(2)(I)	**PSD review applicability:** The facility is located in Bowie County, is not a named source, and has allowable emissions of 9.29 tons per year (tpy) of VOC and 4.29 tpy of NOx. Since the facility is not a major source and it's a construction permit, PSD review does not apply.	
116.111(a)(2)(L)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities?	**No**
	If yes, did the proposed facility, group of facilities, or account obtain allowances to operate:	**N/A**
116.140 - 141	Permit Fee: $ **5, 431.00** Fee certification:	**Yes/ R602799**

Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement
122.10(13)	**Title V applicability:** This facility is not major and does not require a Title V permit.
122.602	**Periodic Monitoring (PM) applicability:** **N/A**
122.604	**Compliance Assurance Monitoring (CAM) applicability:** **N/A**

Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	**5**	**Mr. Jason Sutherlamd**	**No Objections**
City:	**N/A**		
County:	**N/A**		
Toxicology:	**No**		
Compliance:	**N/A**		
Legal:	**Yes**	**Mr. Douglas Brown**	
Comment resolution and/or unresolved issues:			

Process/Project Description

Midway Industrial wants to construct and operate a rail car cleaning facility in Nash, Bowie County. The facility will be located within a 550-acre parcel and encompasses a total of 150 acres. This facility will have the capability of cleaning a maximum of six railcars simultaneously. Upon arrival of the rail cars and prior to cleaning them, Midway Industrial Park authorized personnel, will determine the last contents of each railcar to evaluate the appropriate cleaning methodology and ensure it is cleaned safely.

Midway Industrial Park will receive general purpose rail cars, pressurized rail cars and hopper rail cars. The general purpose rail cars normally have a top dome and a bottom unloading valve and are cleaned by re-circulation of a cleaning solution to achieve a standard of clean, dry, and odor free. Pressurized rail cars contain commodities, including but not limited to, liquid petroleum gas, ammonia, propylene, propane, butadiene, butane and isobutane. Depending on the pressurized rail car content and its specifications, these rail cars are normally cleaned by purging with air or nitrogen and venting the vapors to a control device. Hopper rail cars are used to transport solid material such as powders, pellets, and prils. These rail cars have a top loading openings and a bottom pneumatic slide valves that are connected to a pneumatic conveyance devices during normal unloading. During cleaning the dust and vapors from hopper cars will be collected and filtered through a bag house filter system. The exhaust from the bag house will be directed to the control system. This will remove any dust and destroy any organic vapors emitted.

Midway has three cleaning areas for rail cars. The first area is referred as the de-heeling area, where the rail cars are checked for last content and heel and fitted with a cleaning head. The second is the general purpose rail car cleaning area. The third is the pressure car/hopper car cleaning area.

Cleaning of rail cars will be accomplished by one of several techniques: votalization, solvent wash, alkaline cleaning, acid washing, emulsification, and chelation cleaning. Volatization, may be used for any organic chemical with low boiling points, air may be applied to the rail car to volatilize the commodity. The discharged air from the cleaning process will then be routed to the control system. Solvent wash will be used in the case of heavy organic materials. This is a form of dilution cleaning in which a commodity is removed by diluting it and dissolving it into an organic liquid. Alkaline cleaning is used in cases where organics will be converted to water-soluble soaps and emulsions that can be wetted with water and flushed away. This is normally accomplished by applying heat and highly alkaline cleaning chemicals, such as sodium hydroxide and wetting agents such as linear alkynol amines. Acid washing, is used to remove metal contaminants such as rust and mill scale. Emulsification is used for heavy organics that can be emulsified, making them soluble in water. This method of cleaning employs the emulsification agents and water to remove the residue. Chelation cleaning is a method that selectively removing metal ions. Mild organic acids, such as citric and ethylenediaminetetraacetic acid, are used to chelate selected materials such as iron and copper.

Hopper rail cars are used to transport solid materials. Since these materials do not normally volatilize, cleaning procedures include rinsing of the interior with water to remove any visible residue. During this process a blower will be used to collect sweep air and entrained solids from opening in the top of the railcar. The filter media is designed to remove dust and particles that are released during the cleaning process. The exhaust of this baghouse will be routed to the thermal oxidizer, in order to avoid releasing any additional VOC emissions.. The rinsate is collected from the bottom pneumatic valve and transferred by pump though a filter and into the wastewater treatment system.The liquid material will be routed to the wastewater treatment system through the HYDAC filter and into Equalization Tank #3 (EQ#3). The material will then be refiltered through the bag filters on the effluent of EQ#3 and into the clean water tanks. From there it will be air stripped and returned to the process or sent to the Texarkana publicly-owned water treatment facility (POTW).

All rail car cleaning operations except ammonia, pressurized and hopper rail car cleaning, will be performed indoors. All operations including all rail car cleaning, de-heeling, heel storage, truck loading, tanks, vacuum pumps, wastewater treatment and waste product handling, will be vented to the control system. All vents will be directed to the acid scrubber, then the thermal oxidizer, then the two-stage caustic scrubber and out a sixty foot stack. Ammonia rail cars emissions will be water scrubbed and hopper car emissions will be filtered before going to this control.

Fugitive components in the two buildings are vented thru building stacks. Wastewater fugitives while covered are considered to be outside.

All wastewater except as noted above is routed to equalizing tanks, oil water separator, biodigesters, and air stippers. The respective vents are routed to the scrubber and oxidizer control system. Midway has represented in the application that its wastewater will meet the standards established by the Texarkana POTW. Waste product removed from the wastewater is stored in vessels that are also vented to the scrubber and oxidizer control system. The wastewater system does not have a direct vent to the atmosphere..

WASTE WATER SYSTEM DETAIL

The on-site wastewater treatment plant is set to operate by having wastewater first enter one of two equalizing tanks (EQ#1 or EQ#2) via gravity flow, followed by a 300-gallon per minute (gpm) oil water separator (OWS). The oil water separator is a simple closed gravity separator in which a baffel system will be used to provide directional flow changes allowing oil and light organics to gravity separate to the top and solids to accumulate in the bottom. Midway has represented the oil water separator to be totally enclosed and not vented to the atmosphere.

Any light organics will be skimmed off the water surface from the OWS and sent to a 550-gallon double wall product holding tank. The wastewater organics that come out of the 550-gallon tank and the OWS are transferred to a 4,900 gallon organic waste storage tank. Once this tank reaches its full capacity the organic waste is routed to waste disposal truck and shipped off-site to be disposed of it properly. This 4, 900 gallon organic waste storage tank also receives organic waste created by back-washing and de-watered remains from the filter press.

Once the wastewater has passed thru the equalization tanks (EQ#1 or EQ#2) it is sent to the sequencial biodigesters (SBR). Each SBR system consists of two 30,000 gallon tanks piped in parallel. When one set of SBR's is full the other set will be switched on. The filled SBR will be allowed to incubate followed by its pumping out through the balance of treatment system, while the other set of SBR is filling. These SBR's will be equipped with a twelve inch layer of polyethylene tri-pack media which provides the surface area and a base for biogrowth, thus enhancing bioreactor efficiency. Microbes and nutrients will be added for biological digestion and adjustment of the system. When needed these SBR's will be seeded with bacteria that promotes reductive chlorination. Midway has represented that all the wastewater vents will be routed to the non-halogenated thermal oxidizer stack.

Wastewater passes from the SBR's through an inline HYDAC filter before entering the equalization tank #3 (EQ#3). Particulate that is captured on the filter is back-washed and routed to the 4,900 gallon organic waste storage tank, the return water from the filter press will be sent back to EQ#3, which is vented to thermal oxidizer. The solids from this filter press are collected in a roll-off box, any vents from this roll-off box will be vented to the control system.

Clean water tanks will consist of two 30,000 gallon tanks manifolded together. The wash skid will remove water from these tanks to maintain a level of up to 2,000 gallons in the wash skid reservoir tanks as the process demands. A set amount of this clean water will go through an air stripper to remove volatile organic compounds and ammonia. The four tray air stripper will be vented to the thermal oxidizer system.

Pollution Prevention, Sources, Controls and BACT- [30 TAC 116.111(a)(2)(C)]

Two-Stage Water Scrubber: For control of ammonia rail car cleaning has been represented to have destruction/removal efficiency of 99% for ammonia vented to this scrubber. An ammonia continuous emissions monitoring system (CEMS) is required off the second stage with a 10 ppmv hourly average limit, which is assumed to meet the 99% requirement. This satisfies BACT.

Dust Filter: For hopper car cleaning procedures include rinsing of the interior with water to remove any visible residue. All the blown dust emissions are directed thru a particulate filter with a 0.01 gscf control efficiency. The filtered gas proceeds to the control system where the acid scrubber is used to ensure that particulates do not reach the oxidizer. Calculations were based on the maximum of one hopper car opened per hour, since the hopper car cleaning system is limited to a single cleaning station. These cars will contain a solid material containing a small portion of VOC and PM the calculations resulted in minimal emissions. This satisfies BACT.

Sulfuric Acid Scrubber: The waste gas flows once through the acid scrubber to the thermal oxidizer. The sulfuric acid scrubber has been represented to have a destruction/removal efficiency of 99% for all amines vented to this scrubber. The scrubber liquid circulation rate must be maintained above 30 gallons per minute with a pH below 4 until operating parameters are established during stack testing. This satisfies BACT.

Thermal Oxidizer: Destruction efficiency is 99.9% or 10 ppmv dry at 3% oxygen for VOC. Emissions from the thermal oxidizer will then be routed through a heat recovery and then to the two-stage caustic scrubber. The oxidizer needs to be maintained at 1800°F and 3% oxygen until six minute average operating standards are established during stack testing. The proposed thermal oxidizer will be fired with a low NOx burner rated at 1.5 MMBtu/hr. The remaining combustion force is directly injected with natural gas to achieve a total burner rate of 8.8 MMBtu/hr. The exhaust of the thermal oxidizer will be passed through a waste heat recovery boiler and then be quenched with a water spray prior entering the caustic scrubber. Control of the firing rate of the thermal oxidizer will be varied by monitoring the lower explosive limit in the inlet header, steam demand and quench exhaust temperature. This will ensure a system with high efficiency and emissions are limited by the high degree of turn down designed into the burner system. This satisfies and exceeds current BACT.

Caustic Scrubber: This scrubber takes the flow from the oxidizer quench spray at approximately 130°F, from the thermal oxidizer heat recovery and exhausts to the plant stack. It has been represented to have a destruction removal efficiency of 99% for all halogenated compounds vented to this scrubber. The scrubber liquid circulation rate must be maintained above 35 gallons per minute with a pH over 9 until operating parameters are established during stack testing. This satisfies BACT.

The plant exhaust is blown out of the caustic scrubber thru the twenty-inch stack that is 60 feet high, which was placed towards the center of this site to improve impacts, EPN TO-1.

Fugitives: All fugitive components are controlled using a 28M leak detection and repair program. The fugitive components in the cleaning and de-heeling buildings exhaust thru building stacks clearly too dilute to be controlled. All valves and pumps in light liquid service in the cleaning and de-heeling buildings must be sealess. This satisfies BACT.

Rail Car Opening Emissions: Midway has represented 100% capture for these emissions, and routing to the control system. Capture is to be assured by achieving a surface velocity of 200 fpm at the rail car opening, per U.S. EPA Method 204. Per Special Condition Number 16 initial testing is required to show velocity at the face achieved or a pressure differential measurement of 0.007 inches of water is achieved. There is no EPN associated with these emissions, but the company has agree that if 100% capture efficiency is not satisfied they will come and amend their permit to include these emissions. This would exceed our BACT expectations if they can achieve 100% capture.

Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	**Yes**	Type of Modeling:	**Refined Modeling**
Will GLC of any air contaminant cause violation of NAAQS?			**No**
Is this a sensitive location with respect to nuisance?			**No**
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?			**No**
Additional site/land use information: **N/A**			

Summary of Modeling Results

Site specific atmospheric dispersion modeling was submitted by Midway Industrial Park and was audited and approved by our Air Permits Modeling Team. A generic concentration of 7.43 ug/m3 was derived for a one pound per hour emissions evacuating from the thermal oxidizer stack. See attached information from Keith Zimmerman and Beth Etchels. As noted on the memo the company evaluated all the 250 chemicals that may be cleaned at the facility and all were under their respective ESL values at the property line.

On November 2008, Midway was not satisfied with the old model, thus reran the model using AERMOD and the generic concentration using these parameters, included emissions associated with the fugitives, and the concentration dropped to 6.72 ug/m3 for a one pound per hour emissions. This is the concentration that Midway is required to use to evaluate new chemicals in the chemical flexibility under Special Condition Number 17.

Midway has asked to include flexibility on this permit to have the capability to clean any other materials that may not be authorized under the initial Chemical List. Prior to cleaning this new material, Midway will conduct a proper evaluation of the new material to ensure and access whether the facility is equipped and authorized to clean this material. This evaluation will look at the Effects Screening Level of the new commodity and will be compared to the maximum concentration of the authorized Chemical List that was previously modeled as stated above.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	**Yes**
Company representative(s):	**Mr. S. M. Brooks and Mr. James LaRue**
Contacted Via:	**E-mail**
Date of contact:	**May 18, 2009**
Other permit(s) or permits by rule affected by this action:	**No**
List permit and/or PBR number(s) and actions required or taken:	**N/A**

Texas Commission On Environmental Quality

INTEROFFICE MEMORANDUM

To: Lourdes Rosenberg
Chemical Section

Date: October 5, 2006

Thru: Robert Opiela, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Keith Zimmermann, P.E., and Beth Echels
ADMT

Subject: Modeling Audit - Midway Industrial Park, LLC (RN104761606)

1.0 Project Identification Information.

Permit Application Number: 76962
NSR Project Number: 118307
EBMT Project Number: 2415
NSRP Document Number: 333737
County: Bowie

Modeling Report: Submitted by Hunt Air Strategies, July 2006, on behalf of Midway Industrial Park, LLC. Supplemental modeling was received from Hunt Air Strategies, August 2006.

2.0 Report Summary. The modeling analysis is acceptable for all review types and pollutants. The results are summarized below.

The GLCmax is located approximately 240 meters north of the property line. According to the consultant, the location of the GLCmax is the same as the GLCni and the same for both scenarios.

Table 1. Sitewide Modeling Results for Health Effects

Scenarios	Pollutant	Averaging Time	GLCmax ($\mu g/m^3$)
Chlorinated and Non-Chlorinated Pollutants	Generic	1-hr	7.43
		Annual	0.18

3.0 Land Use. Rural dispersion coefficients and flat terrain were used in the modeling analysis. These selections are consistent with the topographic map and aerial photography.

4.0 Modeling Emissions Inventory. The modeled emission point source parameters and rates were consistent with the modeling report. The source characterization used to represent the source was appropriate.

5.0 Building Wake Effects (Downwash). Building downwash was not modeled since there are no structures on-site that would impact the flow of emissions.

6.0 Meteorological Data.
Surface Station and ID: Shreveport, LA (Station #: 13957)
Upper Air Station and ID: Longview, TX (Station #: 03951)
Meteorological Dataset: 1989
Anemometer Height: 10 meters

7.0 Receptor Grid. The grid modeled was extensive enough in density and spatial coverage to capture representative maximum ground-level concentrations and exceedances.

8.0 Model Used and Modeling Techniques. ISCST3 (Version 02035) was used. The following approach was used in this modeling demonstration:

- A unit emission rate of 1 lb/hr was modeled from the single point source to obtain a generic maximum predicted concentration (GLCmax) for any receptor. The generic GLCmax = 7.43 $\mu g/m^3$ per lb/hr.
- The GLCmax was divided in half to obtain a value = 3.715 $\mu g/m^3$ per lb/hr.
- Each pollutants emission rate was determined by dividing the pollutant specific ESL by 1/2 of the generic GLCmax (i.e., ESL/3.715). This ensures that the GLCmax for a specific pollutant will not be exceeded by more than 2 times the ESL for that pollutant.
- To address the frequency of exceedances of 1 times the pollutant specific ESL (1XESL), the value of 1/2 the GLCmax was used as the threshold in the generic maxi file. This generates a count of hours > 1XESL. The result was 7 hours > 1XESL at the GLCmax.
- The applicant indicates that the actual hours of operation are 6000 hours/year. Thus, the 7 hours > 1XESL was ratioed by 6000/8760 to arrive at a final number of hours > 1XESL equal to 5 hours for each pollutant.

Compliance History

Customer/Respondent/Owner-Operator:	CN602913634 Midway Industrial Park, L.L.C.	Classification: AVERAGE	Rating: 3.01
Regulated Entity:	RN104761606 MIDWAY INDUSTRIAL PARK	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	AIR NEW SOURCE PERMITS PERMIT		76962
Location:	2.5 M W OF NASH TX ON US HWY 82 @ INTERSECTION OF FM 2148 S ON FM 2148 ACROSS RAILROAD TRACKS		
TCEQ Region:	REGION 05 - TYLER		
Date Compliance History Prepared:	February 17, 2011		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	September 22, 2000 to September 22, 2005		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Miriam Hall Phone: (512) 239-1044

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership/operator of the site during the compliance period? No
3. If Yes, who is the current owner/operator? N/A
4. If Yes, who was/were the prior owner(s)/operator(s)? N/A
5. When did the change(s) in owner or operator occur? N/A
6. Rating Date: 9/1/2006 Repeat Violator: NO

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgments, and consent decrees of the State of Texas and the federal government.

B. Any criminal convictions of the state of Texas and the federal government.
N/A

C. Chronic excessive emissions events.
N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)
N/A

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A

F. Environmental audits.
N/A

G. Type of environmental management systems (EMSs).

H. Voluntary on-site compliance assessment dates.
N/A

I. Participation in a voluntary pollution reduction program.
N/A

J. Early compliance.
N/A

Sites Outside of Texas
N/A

Compliance History

Customer/Respondent/Owner-Operator:	CN602913634 Midway Industrial Park, L.L.C.	Classification: AVERAGE	Rating: 3.01
Regulated Entity:	RN104761606 MIDWAY INDUSTRIAL PARK	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	AIR NEW SOURCE PERMITS PERMIT		76962
Location:	2.5 M W OF NASH TX ON US HWY 82 @ INTERSECTION OF FM 2148 S ON FM 2148 ACROSS RAILROAD TRACK:		
TCEQ Region:	REGION 05 - TYLER		
Date Compliance History Prepared:	February 17, 2011		
Agency Decision Requiring Compliance History:	Information Request		
Compliance Period:	February 17, 2006 to February 17, 2011		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Staff Name Phone: 239 - 1000

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership/operator of the site during the compliance period? No
3. If Yes, who is the current owner/operator? N/A
4. If Yes, who was/were the prior owner(s)/operator(s)? N/A
5. When did the change(s) in owner or operator occur? N/A
6. Rating Date: 9/1/2010 Repeat Violator: NO

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgments, and consent decrees of the State of Texas and the federal government.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A