



3/16/2015

Certified Mail

William Wagner
NORFOLK AND SOUTHERN RAILWAY CO
1200 Peachtree Street, NE
Box 13
Atlanta, GA 30309

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0773010154
Permit Number: P0110448
Permit Type: Renewal
County: Scioto

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Portsmouth



Response to Comments

Facility ID:	0773010154
Facility Name:	NORFOLK AND SOUTHERN RAILWAY CO
Facility Description:	
Facility Address:	2435-M EIGHTH ST PORTSMOUTH, OH 45662 Scioto County
Permit:	P0110448, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Portsmouth Times on 01/06/2015. The comment period ended on 02/05/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

N&S comments

1. Topic: 6.8 gallons per hour limit

- a. Comment: N&S believes the 6.8 gallons per hour permit limit should be in section B. of the permit.
- b. Response: The 6.8 gallons needs to be referenced here as it is part of a short term pounds per hour emission limit that was established in the PTI 07-313 issued 12/30/92. We believe the 6.8 gallons per hour should not be listed in Section B. as to not make the facility wide limits too restrictive and the 6.8 gallons per hour facility wide coating was only used for calculating the facility's total potential to emit in the calculations.

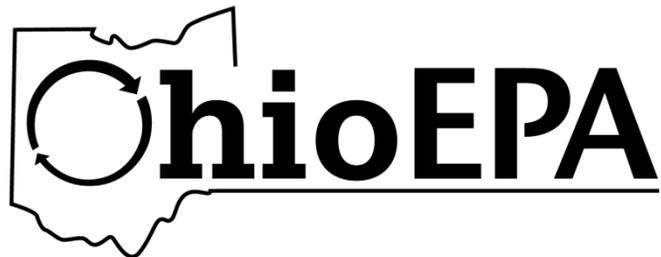
2. Topic: MACT/GACT Applicability

- a. Comment: N&S does not feel this facility is subject to 40 CFR Part 63, Subpart HHHHHH because it does not strip paint using methylene chloride or related compounds; does not coat automobiles or roadway type (rubber tired) equipment as defined in the regulation; and does not spray/apply coatings that contain the target (heavy metal) HAPs. This position is consistent in other states exemption determinations where N&S conducts similar painting operations. We would therefore request that this reference and condition be deleted.



Response to Comments
NORFOLK AND SOUTHERN RAILWAY CO
Permit Number: P0110448
Facility ID: 0773010154

- b. Response: The permit term will be removed per 8/5/2010 Ohio EPA guidance, for area source MACT/GACT rules.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
NORFOLK AND SOUTHERN RAILWAY CO**

Facility ID:	0773010154
Permit Number:	P0110448
Permit Type:	Renewal
Issued:	3/16/2015
Effective:	3/16/2015
Expiration:	3/16/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
NORFOLK AND SOUTHERN RAILWAY CO

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Final Permit-to-Install and Operate
NORFOLK AND SOUTHERN RAILWAY CO
Permit Number: P0110448
Facility ID: 0773010154
Effective Date: 3/16/2015

Authorization

Facility ID: 0773010154
Application Number(s): A0045060
Permit Number: P0110448
Permit Description: PTIO Renewal permit for outdoor spray painting of railway equipment including an administrative modification adding federally enforceable restrictions to this emission unit employing no more than 10 gallons per day and 300 gallons per year of coatings.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/16/2015
Effective Date: 3/16/2015
Expiration Date: 3/16/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

NORFOLK AND SOUTHERN RAILWAY CO
2435-M EIGHTH ST
PORTSMOUTH, OH 45662

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
NORFOLK AND SOUTHERN RAILWAY CO
Permit Number: P0110448
Facility ID: 0773010154
Effective Date: 3/16/2015

Authorization (continued)

Permit Number: P0110448
Permit Description: PTIO Renewal permit for outdoor spray painting of railway equipment including an administrative modification adding federally enforceable restrictions to this emission unit employing no more than 10 gallons per day and 300 gallons per year of coatings.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Spray Paint Railway Equipment
Superseded Permit Number:	07-313
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
NORFOLK AND SOUTHERN RAILWAY CO
Permit Number: P0110448
Facility ID: 0773010154
Effective Date: 3/16/2015

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
NORFOLK AND SOUTHERN RAILWAY CO
Permit Number: P0110448
Facility ID: 0773010154
Effective Date: 3/16/2015

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Facility-Wide Emission Limitations:
 - a) Pursuant to OAC rule 3745-31-05(D), the combined emissions from emissions units K001, K002 and K003 shall not exceed:
 - (1) 15.4 tons/year, based upon a rolling, 12-month summation for volatile organic compounds (VOC) from coatings;
 - (2) 9.9 tons/year, based upon a rolling, 12-month summation for any individual hazardous air pollutant (HAP);
 - (3) 24.9 tons/year, based upon a rolling, 12-month summation for total combined HAPs;
 - (4) 9,800 gallons of coating usage/year, based upon a rolling, 12-month summation; and
 - b) The permittee shall maintain monthly facility-wide records of the following information:
 - (1) The total VOC emissions during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit (K001-K003), in tons. Monthly emissions shall be calculated in accordance with section C.1.d) of this permit
 - (2) The permittee shall collect the following information for all clean-up material applied:
 - a. the name and identification number of each cleanup material employed;
 - b. the VOC content of each cleanup material, in lbs VOC/gallon coating;
 - c. the amount of cleanup material used less the amount recovered, in lbs;
 - d. the total VOC emissions from all cleanup material, the summation of (b x c), in lbs/month; and
 - e. the total rolling, 12-month summation for all cleanup materials used.



- (3) The permittee shall collect and record the following information each month for all materials containing any HAP that are applied in the emissions unit(s):
- a. the name and identification number/code of each coating, cleanup, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied (and identified in (a) above) and the pound(s) of each HAP/gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, cleanup, and any other HAP-containing material applied during the month, less the amount recovered for cleanup;
 - d. for each individual HAP, the total emissions from all the materials employed during the month, in ton(s), i.e., for each individual HAP, the summation of the products of (b x c) for all the materials applied during the month, divided by 2,000 pounds;
 - e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from (d) above;
 - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in (d) above, for the present month plus the previous 11 months of operation, in ton(s); and
 - g. the total combined HAP emissions during the rolling, 12-month period, i.e., the summation of all HAP emissions, as recorded in (e) above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Portsmouth Local Air Agency. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean up materials.

- (4) The permittee shall maintain records of monthly coating usage and the rolling, 12-month summation of total coating usage, in gallons.
- c) The permittee shall submit quarterly deviation (excursion) reports that identify:
- (1) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - a. all exceedances of the rolling, 12-month VOC emission limitations for all the coating, and cleanup materials employed;
 - b. all exceedances of the rolling, 12-month individual and/or total combined HAP(s) emission limitations for all the coating, and cleanup materials employed; and
 - c. all exceedances of the rolling, 12-month coating usage limitation.



- d. the probable cause of each deviation (excursion);
- e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- f. the magnitude and duration of each deviation (excursion).

If no deviations occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Portsmouth Local Air Agency.

- d) The permittee shall also submit annual reports that specify the total facility VOC emissions, for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for the emissions units in the annual Fee Emission Report.
- e) Compliance with the facility-wide coating usage and VOC/HAP emission limitations shall be demonstrated by the record keeping and reporting requirements specified in section B.2.b) and B.2.c) above.



Final Permit-to-Install and Operate
NORFOLK AND SOUTHERN RAILWAY CO
Permit Number: P0110448
Facility ID: 0773010154
Effective Date: 3/16/2015

C. Emissions Unit Terms and Conditions



1. K001

Operations, Property and/or Equipment Description:

Outdoor spray painting of railway equipment - miscellaneous metal parts coating line.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 07-313 issued 12/30/92)	Volatile organic compounds (VOC) emissions shall not exceed 23.0 pounds per hour. VOC emissions shall not exceed 46.0 pounds per day. VOC emissions shall not exceed 0.69 ton per year. See b)(2)a and b)(2)b.
b.	OAC rule 3745-21-09(U)(1)	See b)(2)c.
c.	OAC rule 3745-31-05(D)	See facility-wide section B.2

(2) **Additional Terms and Conditions**

a. The VOC content of coatings employed shall not exceed 4.6 pounds per gallon, excluding water and exempt solvents.



- b. Coating usage shall not exceed 10 gallons per day and 300 gallons per year.
 - c. The emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) pursuant to OAC rule 3745-21-09(U)(2)(e)(iii).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information monthly for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed;
 - d. the total number of gallons of all the coatings employed; and
 - e. the total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b times d)(1)c for each coating employed.

The coating usage records shall be maintained for a minimum of 3 years.

- (2) The permittee shall collect and record the following information monthly for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material employed, in pounds per gallon;
 - d. the total VOC emissions from all cleanup materials employed, in pounds, i.e., the sum of d)(2)b times d)(2)c for each cleanup employed;
 - e. if cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
 - i. the amount of cleanup material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
 - ii. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per



gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;

- iii. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and
- f. the total monthly VOC emission from cleanup operations, in pounds, i.e., [d)(2)d] – [d)(2)e.i x d)(2)e.ii].

* A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

- (3) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in d)(1)e plus the sum of the monthly emissions from cleanup materials for the calendar year in d)(2)d or d)(2)f.

e) Reporting Requirements

- (1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of any coating greater than 4.6 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the in the Authorization section of this permit. The PER shall cover a reporting period of not more than 12-months for each air contaminant source identified in this permit and shall include:
 - a. a statement as to whether the coating operation was in compliance with the daily coating usage limitation (10 gallons per day) and with the annual 12-month usage limitation (300 gallons per year); and
 - b. a statement as to whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(3), did not exceed the tons per year VOC emission limitation.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

VOC emissions shall not exceed 23.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC content of the coating, in pounds of VOC per gallon, excluding water and exempt solvents, times the maximum rate of application of the coating in gallons per hour (6.8 gal/hr) for each coating employed.

b. Emission Limitation:

VOC emissions shall not exceed 46.0 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC content of the coating, in pounds of VOC per gallon, excluding water and exempt solvents, times the daily usage (gallons per day) for each coating employed.

c. Emission Limitation:

VOC emissions shall not exceed 0.69 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the record keeping requirements specified in section d)(3) above.

d. Emission Limitation:

The VOC content of coatings employed shall not exceed 4.6 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the testing requirements specified in f)(2).

- (2) Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC contents of the cleanup materials.



Final Permit-to-Install and Operate
NORFOLK AND SOUTHERN RAILWAY CO
Permit Number: P0110448
Facility ID: 0773010154
Effective Date: 3/16/2015

g) Miscellaneous Requirements

(1) None.