

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 24.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Union Tank Car Company - Muscatine, located at 2603 Industrial Connector Road, Muscatine, Iowa 52761 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Derek Adams.
2. Union Tank Car Company - Muscatine is a railcar rental facility. This facility consists of 18 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	3.30
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	16.90
Particulate Matter	PM	107.05
Sulfur Dioxide	SO ₂	9.97
Nitrogen Oxides	NO _x	64.53
Volatile Organic Compounds	VOC	221.99
Carbon Monoxide	CO	66.05
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	100.91

⁽¹⁾ May include the following: Chromium, cumene, ethyl benzene, glycol ether, hexane, manganese, methanol, methyl isobutyl ketone, naphthalene, nickel, toluene, & xylene.

3. Union Tank Car Company - Muscatine submitted a Title V Operating Permit renewal application on April 16, 2025. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from August 21, 2025 through September 20, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 21-33, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 21-33.
4. DNR is required to comply with 567 IAC Chapter 24 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Application Review Notes

Applicant:	Union Tank Car Co.
SIC Code:	4741 (Rental of Railroad Cars)
City:	Muscatine
County:	Muscatine (FO #6)
EIQ#:	92-5154
Facility#:	70-01-048
Permit #:	03-TV-002R4
Reviewer:	Zane Peters
Date:	07/09/2025

Facility Identification

Facility Name:	Union Tank Car Co.
Facility Location:	2603 Industrial Connector Road, Muscatine, IA 52761
Responsible Official:	Derek Adams

Background

Union Tank Car Co. refurbishes and repairs railroad tanker cars. Steel grit blasting is used to prepare the exterior surfaces for painting and the interior of the cars for rubber liner adhesion. Repair work may also include welding. Prior to refurbishing, interiors of some of the rail cars may need to be vaporized to eliminate VOCs.

Union Tank Car Co. has been identified as one of three major sources of air pollution in the Muscatine area that significantly contributes of predicted PM_{2.5} exceedances. The facility has recently installed mini-pleat filters to comply with the Muscatine PM_{2.5} SIP.

The initial Title V permit for Union Tank Car Co. was issued January 3, 2003; the first renewal permit was issued June 21, 2010; the second renewal was issued October 9, 2015; the third renewal was issued October 19, 2020. This is the fourth renewal of this Title V permit.

Program Applicability

A. Prevention of Significant Deterioration (PSD):

This facility provides railcar rental and repair, which is not one of the 28 listed source categories, so the major source threshold is 250 tpy of any NSR regulated pollutant. The facility's potential to emit (PTE) before and after this project is less than 250 tpy making Union Tank Car a minor source for PSD applicability.

B. Non-Attainment New Source Review (NA-NSR):

Portions of Muscatine County are not meeting the 1-hr SO₂ NAAQs (Non-attainment area). Emission points in this facility emit SO₂, making this facility part of this program.

C. New Source Performance Standards (NSPS):

The facility does not have any emission units subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

D. *National Emission Standards for Hazardous Air Pollutants (NESHAP):*

Union Tank Car has HAP emissions that exceed the major source thresholds so each site is considered a major source. Union Tank Car Company (Plant No. 70-01-048) is subject to the requirements and conditions of Subpart MMMM – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products*. Union Tank Car Company (Plant No. 70-01-048) is also subject to the requirements and conditions of Subpart DDDDD – *Industrial, Commercial, and Institutional Boilers and Process Heaters*.

Changes Since the Last Issuance

General Changes

- Permit number & relevant permitting dates updated
- Responsible Official and Permit Contact information updated
- General Conditions updated
- Executive Order 10 Rules Crosswalk added to the appendices of the permit
- EO10 rule references updated throughout the permit

Emission Point Specific Changes

- EP 1 – Emission Point Characteristics and Operating Requirements updated in accordance with DNR Construction Permit 93-A-251-S7 (pp. 9-10)
- EPs 5E & 5F – New emission points added to the permit in accordance with DNR Construction Permits 25-A-070 & 25-A-071. Emission Points 5A-5D removed. (pp. 26-31)
- EP 7D - Emission Point Characteristics and Operating Requirements updated in accordance with DNR Construction Permit 10-A-043-S5 (pp. 37-41)
- EP 15 - New emission point added to the permit in accordance with the permit renewal application. EP 15 is exempt from construction permitting (pp. 51-52)
- EP 29 - New emission point added to the permit in accordance with the permit renewal application. EP 29 is exempt from construction permitting (pp. 58)

Stack Testing

There are no stack testing requirements at this time.

Periodic Monitoring

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

EP 1 is a Railcar Exterior Grit Blast Booth with a Baghouse and Panel Filter (EC 1) to control emissions. According to the calculations submitted in the permit renewal application, this emission unit is subject to CAM for PM, PM10, and PM2.5. Details of the plan can be found in the body of the permit.

EP 2 is a Railcar Interior Grit Blast Booth with a Baghouse and Panel Filter (EC 2) to control emissions. According to the calculations submitted in the permit renewal application, this

emission unit is subject to CAM for PM, PM10, and PM2.5. Details of the plan can be found in the body of the permit.

EP 3 is a Railcar Interior Grit Blast Booth with a Baghouse and Panel Filter (CE-3 & CE-3A3) to control emissions. According to the calculations submitted in the permit renewal application, this emission unit is subject to CAM for PM, PM10, and PM2.5. Details of the plan can be found in the body of the permit.

EP 4 is a Railcar Vapor Removal System with a Flare (CE-4) to control emissions. Due to the presence of HAPs and the nature of the emission point, a Facility Maintained O&M Plan is required for this renewal. More information can be found in the body of the permit.

EPs 5E, & 5F are Railcar Exterior Painting booths with Dry Filters (CE 5E, CE 5F) to control emissions. Due to the Department's policy towards spraying operations, an Agency Approved O&M Plan is required for this renewal. Details of the plan can be found in the body of the permit.

EPs 6A, 6D, 6F, 6G, 6H, 6I, 6J, & 6K are Railcar Interior Painting/Stencil & Touchup Painting areas with Mini-pleat Filters (CE 6A, CE 6D, CE 6F) to control emissions. Due to the presence of HAPs and the nature of the emission point, an Agency O&M Plan is required for this renewal. More information can be found in the body of the permit.

EPs M1, M2, & M3 are Inline Tank Car Qualification Process (Repair Area) and Welding & Metal Arc Cutting (30 Arc Welders) areas with Mini-pleat Filters (CEM1, CEM2, CEM3) to control emissions. Due to the presence of HAPs and the nature of the emission point, a Facility Maintained O&M Plan is required for this renewal. More information can be found in the body of the permit.

EPs 9A & 9B are Inline Tank Car Qualification Process (Cut Shop) and Welding & Metal Arc Cutting areas with Mini-pleat Filters (CE9A, CE9B) to control emissions. Due to the presence of HAPs and the nature of the emission point, a Facility Maintained O&M Plan is required for this renewal. More information can be found in the body of the permit.