

**CITY of OMAHA
AIR QUALITY CONTROL**

Notice is given to the public according to Chapter 41 of the Omaha Municipal Code of the application of Watco Mechanical Services for a renewal of their air emission operating permit for the railcar repair facility at 13810 "L" Street, Omaha. The potential emissions at this facility, in tons, will be: TSP 65.1, PM10 35.6, PM2.5 11.0, VOC 98.0, individual HAP 9.0 and total HAP 24.0.

No significant impact on air quality is expected from the operation of this facility. Douglas County is in attainment with air quality standards for the listed pollutants. Approval is recommended with the condition that any pollution control equipment that may be necessary for compliance with the City of Omaha or Nebraska Air Pollution Control Rules and Regulations will be installed within 180 days after notification by the City of noncompliance.

All information submitted by the applicant and the proposed approval by Air Quality Control are available for inspection by the public at the office of Omaha Air Quality Control from March 18, 2020 to April 18, 2020. Comments received during that period will be considered. During that period the applicant, or any interested person or group of persons, may request or petition the Control Officer for a public hearing, and state the nature of the issues to be raised and all arguments and factual grounds supporting their position. The Control Officer may hold a public hearing if the comments, requests, or petitions raise legal, policy or discretionary questions and significant public interest exists with respect to the application. Comments should be mailed to:

John Finlan Mayne
Public Works
Air Quality Control
5600 S. 10th Street
Omaha, NE 68107
402-444-3915



City of Omaha

Public Works Department

Air Quality Division
5600 South 10th Street
Omaha NE 68107-3501
Phone: (402) 444-6015
Telefax: (402) 444-6016

CLASS II (SYNTHETIC MINOR)

AIR EMISSION OPERATING PERMIT

FOR

WATCO MECHANICAL SERVICES

**13810 "L" Street
Omaha, NE 68137**

Effective Date: Placeholder Date, 2020

Expiration Date: Placeholder Date, 2025

Renewal Application Due: between Placeholder Date, 2023 and Placeholder Date, 2024

Omaha Air Quality Control
5600 S. 10th Street
Omaha, NE 68107
(402) 444-6015

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SOURCE IDENTIFICATION

OMAHA AIR QUALITY CONTROL OPERATING PERMIT

Class II (SM), Permit No. O20-00241-SM

Issue Date: Placeholder Date, 2020

Effective Date: Placeholder Date, 2020

Expiration Date: Placeholder Date, 2025

In accordance with the provisions of the Omaha Municipal Code, Chapter 41 - Air Quality Control,

Watco Mechanical Services
13810 "L" Street
Omaha, NE 68137

is authorized to operate the emission units shown in Table A-1 at

13810 "L" Street
Omaha, NE 68137

The equipment indicated is subject to the terms and conditions shown in Table A-2 and to the other terms and conditions specified in this permit.

Each condition is followed by the source of the authority for said condition.

PERMIT APPROVAL

The granting of a permit to operate a Class II source shall not affect the responsibility of the owner or operator to comply with applicable portions of the control strategy, including local, state and federal requirements.

Application approved and Class II operating permit granted:

Signed: _____

John Finlan Mayne (OAQC Officer)

Table A-1

Table A-1: Emission Unit Identification and Description				
Emission Unit Number	Emission Unit Description	Make/Model	Size	Control Equipment
PB01	Paint Booth	N/A	3 gallons/min	Paint Filter
GB01	Grit Blaster	N/A	4320 lb grit/hr	(2) Baghouses
SB01	Sand Blaster	N/A	960 lb sand/hr	Partial Enclosure

Table A-2

Table A-2: Emission Unit Emission Limits and Work Practice Standards				
Emission Unit Number	Pollutant/Parameter	Emission Limit/Work Practice Standard	Permit Condition	Monitoring Requirements
PB01	VOCs	<ul style="list-style-type: none"> Emissions shall not exceed 98 tons in any 12-month rolling period. 	Specific Condition 1.b.	Recordkeeping
	Individual HAP	<ul style="list-style-type: none"> Emissions shall not exceed 9 tons in any 12-month rolling period. 	Specific Condition 1.c.	Recordkeeping
	Total HAPs	<ul style="list-style-type: none"> Emissions shall not exceed 24 tons in any 12-month rolling period. 	Specific Condition 1.d.	Recordkeeping
	VOC and HAP Emissions	<ul style="list-style-type: none"> Shall be calculated using mass balance methodology. 	Specific Condition 1.e.	Recordkeeping
	Paint Filter	<ul style="list-style-type: none"> Shall always be functioning properly to capture and control particulate emissions. 	Specific Condition 1.f.	Recordkeeping
GB01	Baghouse	<ul style="list-style-type: none"> Shall always be functioning properly to capture and control particulate emissions. 	Specific Condition 1.g.	Recordkeeping
SB01	Partial Enclosure	<ul style="list-style-type: none"> Shall help minimize particulate emissions. 	Specific Condition 1.h.	None
Plant wide	Opacity	<ul style="list-style-type: none"> Shall not equal or exceed 20%. 	General Condition 10.b.	None
	Odors	<ul style="list-style-type: none"> Shall not cause objectionable odorous emissions into the ambient air. 	Specific Condition 1.i.	None

SPECIFIC CONDITIONS

1. Emission Limits / Work Practice Standards

- 1.a.** [No alternative scenarios are identified in this permit.]

Paint Booth- Voluntary limits:

- 1.b.** The facility shall not emit more than 98 tons of VOCs from emission unit PB01 in any 12-month rolling period. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 5.001.03A]
- 1.c.** The facility shall not emit more than 9 tons of any individual HAP from emission unit PB01 in any 12-month rolling period. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 5.001.03A]
- 1.d.** The facility shall not emit more than 24 tons of total HAPs from emission unit PB01 in any 12-month rolling period. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 5.001.03A]
- 1.e.** VOC and HAP emissions from emission unit PB01 shall be calculated using the following assumptions:
- 1.e.i.** All VOC and HAP-containing material purchased is used; and
 - 1.e.ii.** All VOC and HAP compounds contained in the material are emitted. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 5.001.03A]
- 1.f.** Filterable particulate emissions from emission unit PB01 shall be captured and controlled by the fabric filters as follow:
- 1.f.i.** The fabric filters shall be properly installed, operated and maintained and shall be operating whenever the corresponding emission unit PB01 is in operation;
 - 1.f.ii.** All fabric filter-associated capture and air-handling equipment shall be in good repair and operating properly to allow emissions to be controlled by the fabric filters;
 - 1.f.iii.** The fabric filters shall be inspected at least once a day. The inspector shall determine whether there are any visible emissions related to the fabric filters; and
 - 1.f.iv.** Corrective action shall be taken immediately whenever there are any deviations to the proper operating state of the fabric filters. The permittee shall have spare filters and other related equipment located on-site to facilitate rapid repair. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 5.001.03A]

Grit Blaster- Voluntary limits:

- 1.g.** Filterable particulate emissions from emission unit GB01 shall be captured and controlled by the baghouse as follow:
- 1.g.i.** The baghouse shall be properly installed, operated and maintained and shall be operating whenever emission unit GB01 is in operation;
 - 1.g.ii.** All baghouse-associated capture and air-handling equipment shall be in good repair and operating properly to allow emissions to be controlled by the baghouse;
 - 1.g.iii.** Each baghouse compartment shall have a functioning gauge that measures the pressure drop. The gauge shall be properly installed, operated, calibrated and maintained. The

static pressure drop across each compartment shall be maintained within the following range: 1.0 to 6.0 inches H₂O;

- 1.g.iv.** The baghouse shall be inspected at least once a day. The inspector shall determine whether there are any visible emissions related to the baghouse; and
- 1.g.v.** Corrective action shall be taken immediately whenever there are any deviations to the proper operating state of the baghouse. The permittee shall have spare filters and other related equipment located on-site to facilitate rapid repair. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 5.001.03A]

Sand Blaster- Voluntary limits:

- 1.h.** Particulate emissions from emission unit SB01 shall be reduced by the associated partial enclosure. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 5.001.03A]

Local Regulation – Not federally enforceable:

- 1.i.** The permittee shall not cause or permit the emissions of any objectionable odorous matter into the ambient air in amounts detectable pursuant to the standards set forth in Omaha Municipal Code 41-58 (b) – (d) without applying all reasonable measures as may be required to prevent odors beyond the premises where it originates. [Omaha Municipal Code, Section 41-58, (a)]

2. Testing Requirements

- 2.a.** Testing requirements are not applicable to any emission units at this source.

3. Monitoring Requirements

- 3.a.** The permittee shall track VOC emissions for emission unit PB01 on a monthly basis as required by Specific Condition 4.a. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
- 3.b.** The permittee shall track individual and total HAP emissions for emission unit PB01 on a monthly basis as required by Specific Condition 4.b. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
- 3.c.** The Permittee shall monitor the fabric filter operations for emission unit PB01 on a daily basis as required by Specific Condition 4.c. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
- 3.d.** The Permittee shall monitor the baghouse operations for emission unit GB01 on a daily basis as required by Specific Condition 4.d. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]

4. Recordkeeping Requirements

- 4.a.** A log of VOC emissions shall be maintained and shall be updated monthly for emission unit PB01 in order to demonstrate compliance with Specific Condition 1.b. The log shall be completed by the 15th of the following month and shall include the following information:
 - 4.a.i.** The amount of each VOC-containing material (in pounds) used in the previous month;
 - 4.a.ii.** The mass fraction of VOC present in each VOC-containing material used in the previous month. If the mass fraction is a range, the maximum percent by weight shall be used;

- 4.a.iii.** The total amount of VOCs (in pounds) that were used and emitted in the previous month; and
 - 4.a.iv.** The total amount of VOCs (in pounds and tons) that were emitted in the previous 12-month rolling period. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
 - 4.b.** A log of HAP emissions shall be maintained and shall be updated monthly for emission unit PB01 in order to demonstrate compliance with Specific Conditions 1.c. and 1.d. The log shall be completed by the 15th of the following month and shall include the following information:
 - 4.b.i.** The amount of each HAP-containing material (in pounds) used in the previous month;
 - 4.b.ii.** The mass fraction of each HAP present in each HAP-containing material used in the previous month. If the mass fraction is a range, the maximum percent by weight shall be used;
 - 4.b.iii.** The total amount (in pounds) of each individual HAP that was used and emitted in the previous month ; and
 - 4.b.iv.** The total amount of each individual HAP and the total amount of all HAPs in aggregate (in pounds and tons) that were emitted in the previous 12-month rolling period. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
 - 4.c.** A log of paint filter maintenance shall be maintained and shall be updated daily for emission unit PB01 in order to demonstrate compliance with Specific Condition 1.f. The logs shall include the date and time of all maintenance including preventive maintenance and each paint filter replacement and the initials of the person conducting the inspections, maintenance, and filter replacement. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
 - 4.d.** A log of baghouse operations shall be maintained and shall be updated daily for emission unit GB01 in order to demonstrate compliance with Specific Condition 1.g. The log shall include the following information:
 - 4.d.i.** Baghouse compartment identification;
 - 4.d.ii.** Operational condition and effectiveness of the baghouse-associated capture and air-handling equipment;
 - 4.d.iii.** The daily pressure drop readings;
 - 4.d.iv.** The results of the daily visual emissions check;
 - 4.d.v.** The date and time of all maintenance including preventive maintenance and each fabric filter replacement and the initials of the person conducting the inspections, maintenance, and filter replacement;
 - 4.d.vi.** Any occurrence of the pressure drop readings falling outside of the general operating range indicated in Specific Conditions 1.g.iii. shall be noted in the log as a deviation
 - 4.d.vii.** Any occurrence of visible emissions related to the baghouses and the baghouse-associated capture and air-handling equipment shall be noted in the log as a deviation; and
 - 4.d.viii.** Any failure to perform maintenance per Specific Condition 1.g.v. shall be noted in the log as a deviation. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]

- 4.e. All records required herein and support information shall be maintained on site for inspection and shall be retained for a period of five years. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulations, Chapter 8.015.03]

5. Reporting Requirements

- 5.a. The source shall complete and submit to OAQC an annual emissions inventory on forms furnished by OAQC by March 31, and shall include emission information for the previous calendar year. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 6.001] The permittee shall be able to supply all supplemental information to verify or otherwise assure the quality of emissions reported. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 6.005]
- 5.b. The permittee shall complete and submit to OAQC an annual deviation report. The report shall list all instances of deviations from permit requirements. The report shall list the probable cause for the deviation and corrective actions or preventive measures taken. If there were no deviations to report, the permittee shall submit a statement to that effect as their report. The due date for the annual report shall be January 30th of each year. The report shall cover the preceding calendar year. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
- 5.c. The permittee shall report all deviations from permit requirements, including those attributable to upset conditions. The deviations shall be reported as follows:
 - 5.c.i. Any deviation resulting from emergency or upset conditions shall be reported within two working days of the date on which the permittee first becomes aware of the deviation if the permittee wishes to assert the affirmative defense authorized under Chapter 11 of Nebraska Title 129;
 - 5.c.ii. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as it is practicable; and
 - 5.c.iii. All other deviations shall be reported as per Specific Condition 5.b. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
- 5.d. All reports required by this permit shall be submitted with a certification by the responsible official that meets the requirements of Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 7.008. Reports submitted under Specific Conditions 5.c.i and 5.c.ii may be submitted initially without a certification by a responsible official if an appropriate certification is provided within ten days thereafter, together with any corrected or supplemental information required concerning the deviation. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]
- 5.e. All reports required herein and support information shall be maintained on site for inspection and shall be retained for a period of five years. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.015.03]

GENERAL CONDITIONS

1. Permit Renewal and Expiration

- 1.a. This permit is issued for a fixed period of 5 years. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.003.01] The permittee's right to operate this source is subject to termination with the expiration of this permit unless a timely and complete renewal application is submitted at least 6 months before the expiration date. In no event shall this time be greater than 18 months. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 7.002.06] Upon receipt of a complete application for renewal, this source may continue to operate subject to final action by OAQC on the renewal application. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 7.003.04] The application for renewal shall include the current permit's number, description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 7.003.01] The application shall be sent to OAQC.

2. Transfer of Ownership or Operation

- 2.a. This permit is not transferable. An administrative permit amendment allows for a change in ownership or operational control of a source where the permitting authority determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the permitting authority. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.001.01D]

3. Property Rights

- 3.a. This permit does not convey any property rights of any sort, or any exclusive privilege. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.007.04]

4. Recordkeeping Requirements

- 4.a. Records of required monitoring information will include, if necessary, the following information:
- 4.a.i. The date and place as defined in the permit and time of sampling or measurement; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.004.02A1]
 - 4.a.ii. The date(s) analyses were performed; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.004.02A2]
 - 4.a.iii. The company or entity that performed the analyses; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.004.02A3]
 - 4.a.iv. The analytical techniques or methods used; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.004.02A4]
 - 4.a.v. The results of the analyses; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.004.02A5]

- 4.a.vi. The operating conditions existing at the time of sampling or measurement. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.004.02A6]

5. Submissions

- 5.a. Reports, test data, monitoring data, notifications, and requests for renewal shall be submitted to:

Omaha Air Quality Control
5600 S. 10th Street
Omaha, NE 68107
(402) 444-6015

6. Inspection and Entry

- 6.a. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of OAQC, DEQ and the EPA to perform the following during normal business hours or at any time an emergency condition exists: [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.012.02]
 - 6.a.i. Enter upon the permittee's premises where a source or activity is located or conducted, or where records must be kept under the conditions of this permit; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.012.02A]
 - 6.a.ii. Have access to and copy at reasonable times any records that must be kept under the conditions of this permit; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.012.02B]
 - 6.a.iii. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.012.02C]
 - 6.a.iv. Sample or monitor any substances or parameters relevant to the permit at any location during operating hours. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.012.02D]
- 6.b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties. [Omaha Municipal Code, Section 41-10]

7. Compliance

- 7.a. The permittee must comply with all conditions of this permit. Any noncompliance with a federally enforceable permit condition constitutes a violation of the Clean Air Act and is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. Noncompliance may also be grounds for assessment of civil penalties. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.007.01]
- 7.b. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.007.02]

- 7.c. The permittee shall continue to comply with the applicable requirements for which compliance has already been certified in the permit application. [Omaha Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.012.03]
- 7.d. The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.012.03]
- 7.e. Notwithstanding any other provisions of this Title, the following methods may be used to determine compliance with applicable requirements:
 - 7.e.i. A monitoring method approved for the source and incorporated in an operating permit pursuant to Chapter 8;
 - 7.e.ii. Any compliance test method specified in the State Implementation Plan;
 - 7.e.iii. Any test or monitoring method approved for the source in a permit issued pursuant to Chapters 17, 19, or 27;
 - 7.e.iv. Any test or monitoring method provided for in this Title; or
 - 7.e.v. Any other test, monitoring, or information-gathering method that produces information comparable to that produced by any method described in 8.e.i. through 8.e.iv. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 34.008.]

8. Excess Emissions Due to an Emergency

- 8.a. The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that: [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 11.003]
 - 8.a.i. An emergency occurred and that the permittee can identify the cause(s) of the emergency; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 11.003.01]
 - 8.a.ii. The permitted facility was at the time being properly operated; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 11.003.02]
 - 8.a.iii. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 11.003.03] and
 - 8.a.iv. The permittee submitted notice of the emergency to OAQC within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 11.003.04]

9. Duty to Provide Information

- 9.a. The permittee shall furnish to OAQC, within a reasonable time, any information that OAQC may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to OAQC copies of records that the permittee is required to

keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to OAQC along with a claim of confidentiality. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.007.05]

- 9.b.** Any other test, monitoring, or information-gathering method that produces information comparable to that produced by any method described in this permit may also be used to determine compliance with applicable requirements. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 34.008.05]

10. Particulate Emissions

- 10.a.** The facility may not cause or allow particulate matter caused by the combustion of fuel to be emitted from any stack or chimney into the outdoor atmosphere in excess of the rate as determined by Table 20-1 of NDEQ regulation, Title 129, Chapter 20. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 20.002]
- 10.b.** No person shall cause or allow emissions, from any existing source, which are of an opacity equal to or greater than 20 percent (20%), as evaluated by Method 9 in Appendix A of 40 CFR § 60 or recorded by a continuous opacity monitoring system operated and maintained pursuant to 40 CFR § 60 Appendix B. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 20.004]

11. Dust, Duty to Prevent Escape of

- 11.a.** No person may cause or permit the handling, transporting, or storage of any material in a manner that may allow particulate matter to become airborne in such quantities and concentrations that it remains visible in the ambient air beyond the premises where it originates. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 32.001]
- 11.b.** No person may cause or permit a building or its appurtenances or a road, or a driveway, or an open area to be constructed, used repaired or demolished without applying all such reasonable measures to prevent particulate matter from becoming airborne so that it remains visible beyond the premises where it originates. The Director may require such reasonable measures as may be necessary to prevent particulate matter from becoming airborne, including but not limited to paving or frequent cleaning of roads, driveways and parking lots; application of dust-free surfaces; application of water; and the planting and maintenance of vegetative ground cover. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 32.002]

12. Reopening for Cause; revocation and reissuance; and termination

- 12.a.** OAQC shall reopen, revoke and reissue, or terminate this permit, during its term for cause, including but not limited to:
- 12.a.i.** Additional requirements under the CAA become applicable to the source 3 or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.01A]
- 12.a.ii.** Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program under Chapter 26. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.01B]

- 12.a.iii.** OAQC determines that the permit must be revoked and reissued to assure compliance with the applicable requirements. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.01C]
- 12.a.iv.** OAQC determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.01D]
- 12.a.v.** OAQC determines that an applicable requirement or applicable requirement under the Act applies which was not identified by the permittee in its application. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.01E]
- 12.b.** OAQC may revoke this permit, during its term for cause, including but not limited to:
 - 12.b.i.** The existence at the facility of unresolved noncompliance with applicable requirements or a term or condition of the permit, and refusal of the permittee to agree to an enforceable schedule of compliance to resolve the noncompliance. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.02A]
 - 12.b.ii.** The permittee has falsely certified or submitted false, incomplete, or misleading information to OAQC or EPA. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.02B]
 - 12.b.iii.** The Director determines that the permitted facility or activity endangers human health or the environment and that the danger cannot be removed by a modification of the permit. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.02C]
 - 12.b.iv.** The permittee has failed to pay a penalty owed pursuant to court order, stipulation and agreement, or order issued by the Administrator of EPA. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.02D]
- 12.c.** Reopening shall not be initiated before a notice of intent to reopen is provided to the permittee by OAQC at least 30 days in advance of the date that this permit is to be reopened, except that OAQC may provide a shorter time period in the case of an emergency. Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 15.006.03]
- 12.d.** The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.007.03]

13. Severability Clause

- 13.a.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 8.006]

14. Fees

- 14.a.** The permittee shall pay any applicable annual fee to the City of Omaha's Finance Department. The fee will be due and payable upon receipt of the invoice from the Finance Department, but not prior to July 1 of each year. The fee will be based on that year's existing rate structure as reviewed and/or adopted by the City Council by resolution. [Omaha Municipal Code, Section 41-2, Chapter 29.007]

15. Compliance; Exceptions Due to Startup, Shutdown or Malfunction

- 15.a.** Upon receipt of a notice of excess emissions issued by OAQC, the source to which the notice is issued may provide information showing that the excess emissions were the result of a malfunction, start-up, or shutdown. Based upon any information submitted by the source operator, and any other pertinent information available, the Director shall make a determination whether the excess emissions constitute a malfunction, start-up, or shutdown; and whether the nature, extent, and duration of the excess emissions warrant enforcement action. In determining whether enforcement action is warranted, the Director shall consider the following: [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 35.001]
- 15.a.i.** Whether the excess emissions during start-up, shutdown, or malfunction, occurred as a result of safety, technological, or operating constraints of the control equipment, process equipment, or process. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 35.001.01]
- 15.a.ii.** Whether the air pollution control equipment, process equipment, or processes were maintained and operated to the maximum extent practical for minimizing emissions. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 35.001.02]
- 15.a.iii.** Whether repairs were made as expeditiously as practicable when the operator knew, or should have known, when excess emissions were occurring. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 35.001.03]
- 15.a.iv.** Whether the amount and duration of the excess emissions were limited to the maximum extent practical during periods of such emissions. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 35.001.04]
- 15.a.v.** Whether all practical steps were taken to limit the impact of the excess emissions on the ambient air quality. [Omaha Municipal Code, Section 41-2, incorporating NDEQ regulation, Title 129, Chapter 35.001.05]

16. Protection of Stratospheric Ozone

- 16.a.** The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR § 82, Subpart E:
- 16.a.i.** All containers containing a class I or class II substance that is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance, must bear the required warning statement if it is being introduced into interstate commerce pursuant to 82.106.
- 16.a.ii.** The placement of the required warning statement must comply with the requirements pursuant to 82.108.
- 16.a.iii.** The form of the label bearing the required warning statement must comply with the requirements pursuant to 82.110.

- 16.a.iv.** No person may modify, remove, or interfere with the required warning statement except as described in 82.112.
- 16.b.** The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- 16.b.i.** Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- 16.b.ii.** Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
- 16.b.iii.** A technician, certified by an approved technician certification program pursuant to §82.161, must perform maintenance, service, repair, or disposal of appliances.
- 16.b.iv.** Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with record keeping requirements pursuant to 82.166 and with work practice requirements pursuant to 82.156 (f). ("MVAC-like appliance" as defined at 82.152)
- 16.b.v.** Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 82.156.
- 16.b.vi.** Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 82.166.
- 16.c.** If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR § 82, Subpart A, Production and Consumption Controls.
- 16.d.** If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR § 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assemble of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the airtight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 16.e.** The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR § 82, Subpart G, Significant New Alternatives Policy Program.

17. Risk Management Plan

- 17.a.** The permittee, if subject to the provisions of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency, a risk management plan in accordance with 40 CFR Part 68.

18. Regulations

- 18.a.** All citations (unless otherwise stated) are to the regulations in effect as of the date this permit is issued.

Glossary

Attainment area	Any area that meets the primary and secondary national ambient air quality standard (NAAQS) for the pollutant.
Btu	British thermal units
CAA	Clean Air Act, first passed in 1970, amended in 1977, with major modifications made in the 1990 Clean Air Act Amendments (CAAA)
CFR	Code of Federal Regulations
CO	Carbon Monoxide
Emission Inventory	A catalog or listing of emissions from a source, usually based on measurements, calculations, or other information regarding pollutant information.
Emission Unit	Each piece of equipment within a source that is capable of producing air pollutants.
EPA	Environmental Protection Agency
HAP	Hazardous Air Pollutant(s), identified in § 112 of the 1990 CAAA. There are currently 187 pollutants listed.
M	Thousand
MACT	Maximum Achievable Control Technology – A subset of NESHAP regulations.
Major Source	For the Title V program, a major source has the potential to emit; 1) 10 TPY or more of any one HAP or 25 TPY or more of any combination of HAPs, OR 2) 100 TPY or more of any air pollutant
Mass Balance	Used to convert gallons of material used into pounds of pollutant using material density and the percentage of pollutant in the material.
MM	Million (One thousand times one thousand)
MMBtu	Million British thermal units
MVACs	Motor Vehicle Air Conditioner
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industrial Classification System – Adopted in 1997 by the Office of Management and Budget to be used by statistical agencies of the United States. These identifiers are also be used by Canada and Mexico. Replaces the 1987 SIC.
NESHAP	National Emission Standards for Hazardous Air Pollutants applies to existing as well as new or modified sources. These may apply to sources not otherwise affected by the operating permit program.
NH ₃	Ammonia
Non-attainment	A geographic area that does not meet, or exceeds, established air pollution levels. An area may be a non-attainment area for certain criteria pollutants and may be an attainment area for other criteria pollutants.
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards apply to new or modified sources, are industry or process specific, and regulate emission limits.
NSR	New Source Review is applicable to all major sources.
OAQC	Omaha Air Quality Control

Permit Shield	Deems a source to be in compliance as long as the terms and conditions of the permit are met.
PM	Particulate Matter
PM ₁₀	Particulate matter less than 10 micrometers in diameter
PM _{2.5}	Particulate matter less than 2.5 micrometers in diameter
PSD	Prevention of Significant Deterioration is a subset of the NSR program and is only applicable in attainment areas.
PTE	Potential To Emit
SCC	Source Classification Code
SIC	Standard Industrial Classification – A statistical classification standard underlying all establishment-based Federal economic statistics classified by industry.
Source	A business operation, organization, plant, or plant complex whose operation creates air pollutants.
SO _x	Sulfur Oxides, mostly sulfur dioxide (SO ₂)
Synthetic Minor	A source using enforceable limitations to avoid classification as a major source.
Title V	One of eleven subdivisions of the 1990 Clean Air Act Amendments, this requires an operating permit system for each state and is often used to refer to the operating permit(s) issued under this requirement.
TMRA	Twelve month rolling average (twelve consecutive months)
TPY	Tons per year
TSP	Total Suspended Particulates
VOC	Volatile Organic Compound means any organic compound which participates in atmospheric photochemical reactions.

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BASIS OF PERMIT

Watco Mechanical Services
13810 “L” Street
Omaha NE 68137

DESCRIPTION OF THE FACILITY AND AFFECTED UNITS:

Watco Mechanical Services is a railcar and repair and painting facility. The 2 digit Standard Industrial Classification (SIC) Code for the facility is 47.

The facility has the following emission units:

<u>Emission Unit</u>	<u>Unit Description</u>
Paint Booth PB01	3.0 gal/minute with Paint Filter
Grit Blaster GB01	4320 lb. grit/hour with Baghouse
Sand Blaster SB01	960 lb. sand/minute with Partial Enclosure

The facility also has the following insignificant equipment:

- Drying Oven- natural gas fired; 1.1 MMbtu/hr
- Hotsy Pressure Washer- natural gas fired; 2 burners @ 1.04 MMbtu/hr
- (22) Space Heaters- natural gas fired; 0.13 MMbtu/hr each

DESCRIPTION OF THE PERMIT ACTIVITY:

Watco is an existing facility that has a Synthetic Minor operating permit. The permit (#O241SM) expired March 26, 2019. The source submitted an application to renew the operating permit for this facility on September 26, 2018.

PERMITTING HISTORY:

The operating permit (#O241MA) was first issued on March 24, 1998 as a Title V operating permit and was amended on June 12, 2002 to reflect a change in ownership.

The operating permit was renewed as a synthetic minor (#O241SM) and was issued on September 22, 2006.

The operating permit was last renewed on March 26, 2014 and then amended on September 10, 2014 to reflect another change in ownership.

TYPE AND QUANTITY OF AIR CONTAMINANT EMISSIONS ANTICIPATED:

Watco Mechanical Services repairs and paints railcars. The facility may also repair and paint truck frames.

Particulate, VOC and HAP emissions from the paint booth are calculated by using mass-balance formulas. The maximum rate for each unit is listed in the table found on Page 1 of this document. The worst case application rates and the worst case Particulate, VOC and HAP contents from the MSDS sheets of the materials are used to calculate the Potential-To-Emit (PTE) of these units.

The operating permit limits total emissions from the paint booth to the following: 98 tons/year of VOC, 9 tons/year of any one HAP and 24 tons/year of total HAPs. The limits are yearly totals, calculated on a rolling 12-month basis. The operating permit requires the use of paint filters to limit particulate emissions from the paint booths.

Particulate emissions from the grit blasting unit are calculated by using emission factors derived from the EPA FIRE database. The operating permit requires the use of a baghouse to limit particulate emissions from the grit blaster.

Particulate emissions from the sand blasting unit are calculated by using emission factors derived from the EPA FIRE database. The particulate emissions from this process are minimized by a partial enclosure system.

The following table summarizes the permitted potential emissions from the operating permit:

<u>Regulated Pollutant</u>	<u>PTE (tpy)</u>
Particulate Matter	65.05
PM-10	35.61
PM-2.5	11.01
Volatile Organic Compounds (VOC)	98.00
Any individual HAP	9.00
Total HAPs	24.00

APPLICABLE REQUIREMENTS :

This permit is a Synthetic Minor operating permit.

The permit conditions specific to the proposed permit are as follows:

1. Emission Limits / Work Practice Standards

- 1.a. This condition states that there are no alternative scenarios for this source.
- 1.b. The permittee has chosen to limit the amount of VOC that is emitted from the paint booth. This condition states that voluntary limit. This is a local, state and federal requirement.
- 1.c. The permittee has chosen to limit the amount of any individual HAP that is emitted from the paint booth. This condition states that voluntary limit. This is a local, state and federal requirement.
- 1.d. The permittee has chosen to limit the amount of total HAP that is emitted from the paint booth. This condition states that voluntary limit. This is a local, state and federal requirement.
- 1.e. This condition establishes the formula used for calculating VOC and HAP emissions from the paint booths. The ‘formula method’ is considered a valid form of a production or operational limit by the EPA. This is a local, state and federal requirement.
- 1.f. The permittee has chosen to control the filterable particulate emissions from the paint booth with paint filters. This condition states that operational limit. This is a local, state and federal requirement.
- 1.g. The permittee has chosen to control the filterable particulate emissions from the grit blasting operation with a baghouse. This condition states that operational limit. This is a local, state and federal requirement.
- 1.h. The permittee has chosen to minimize the filterable particulate emissions from the sand blasting operation with a partial enclosure. This condition states that operational limit. This is a local, state and federal requirement.
- 1.i. This condition states the odor requirement for the source. This is a local requirement.

2. Testing Requirements

- 2.a. There are no testing requirements for this source.

3. Monitoring Requirements

- 3.a. This condition requires the monitoring of VOC emissions for the paint booth in order to make the voluntary limit enforceable. This is a local, state and federal requirement.
- 3.b. This condition requires the monitoring of individual and total HAP emissions for the paint booth in order to make the voluntary limit enforceable. This is a local, state and federal requirement.

- 3.c. This condition requires that the paint filters be monitored in order to make the voluntary limit enforceable. This is a local, state and federal requirement.
- 3.d. This condition requires that the baghouse be monitored in order to make the voluntary limit enforceable. This is a local, state and federal requirement.

4. Recordkeeping Requirements

- 4.a. This condition requires that a record of VOC emissions for the paint booth be kept in order to make the voluntary limit enforceable. This is a local, state and federal requirement.
- 4.b. This condition requires that a record of individual and total HAP emissions for the paint booth be kept in order to make the voluntary limit enforceable. This is a local, state and federal requirement.
- 4.c. This condition requires that a record of paint filter maintenance be kept in order to make the voluntary limit enforceable. This is a local, state and federal requirement.
- 4.d. This condition requires that a record of baghouse operations be kept in order to make the voluntary limit enforceable. This is a local, state and federal requirement.
- 4.e. All records required by the permit and support information shall be kept on site and be available for inspection. This is a local, state and federal requirement.

5. Reporting Requirements

- 5.a. An annual emission inventory shall be submitted and any supporting documentation shall be maintained. This is a local, state and federal requirement.
- 5.b. The permittee is required to submit an annual deviation report. This is a local, state and federal requirement.
- 5.c. This condition requires reporting of any permit deviation. This is a local, state and federal requirement.
- 5.d. This condition requires all reports submitted to OAQC shall include a certification by the responsible official. This is a local, state and federal requirement.
- 5.e. All reports required by the permit and support information shall be kept on site and be available for inspection. This is a local, state and federal requirement.

STATUTORY OR REGULATORY PROVISIONS:

Operating Permits [Omaha Municipal Code, Section 41-2, Chapter 5]-

The facility is a synthetic minor source and requires a Class II operating permit.

NSPS [Omaha Municipal Code, Section 41-2, Chapter 18]-

The facility is not subject to any NSPS requirements.

PSD [Omaha Municipal Code, Section 41-2, Chapter 19]-

The facility is not considered major for future PSD permitting purposes because permitted potential emissions do not exceed those thresholds.

Particulate Emissions [Omaha Municipal Code, Section 41-2, Chapter 20, Section 002]-

The units are expected to comply with this regulation because all significant particulate emission sources are being controlled or minimized.

Opacity [Omaha Municipal Code, Section 41-2, Chapter 20, Section 004]-

The units are expected to comply with this regulation because all significant particulate emission sources are being controlled or minimized.

Sulfur Compound Emissions [Omaha Municipal Code, Section 41-2, Chapter 24]-

The units are expected to comply with this regulation because there are no significant sulfur compound emission sources.

Acid Rain [Omaha Municipal Code, Section 41-2, Chapter 26]-

The facility is not subject to Acid Rain requirements because it does not produce electricity for sale.

State BACT [Omaha Municipal Code, Section 41-2, Chapter 28]-

The source is not subject to Nebraska BACT requirements.

NESHAP [Omaha Municipal Code, Section 41-2, Chapter 28]-

The paint booth is exempt from MACT Subpart 6H requirements. The unit does not use any of the target HAPs. Additionally, the source does not manufacture motor vehicle/mobile equipment or use methylene chloride at this facility.

CAM [Omaha Municipal Code, Section 41-2, Chapter 31]-

The units are not subject to CAM standards because they do not rely on add-on pollution control devices to meet air quality standards.

Emission Sources- Testing & Monitoring [Omaha Municipal Code, Section 41-2, Chapter 34]-

The facility is not subject to testing and COMS requirements.

PROCEDURES FOR FINAL DETERMINATION:

The public notice, as required under NAQR Chapter 14, shall be published on March 18, 2020. Persons or groups shall have 30 days from that issuance of public notice (April 18, 2020) to provide the OAQC with any written comments concerning the proposed permit action and/or to request a public hearing, in accordance with NAQR Chapter 14. Persons having comments or requesting a public hearing may contact:

John Finlan Mayne
Air Quality Engineer
Air Quality Control Division
Omaha Public Works Department
5600 S 10th Street
Omaha NE 68107

If no public hearing is requested, the permit may be granted at the close of the 30-day comment period. If a public hearing is requested, the Director may choose to extend the date on which the permit is to be granted until after that public hearing has been held

Telephone inquiries may be made at: (402) 444-3915