

March 12, 2021

Michael Preller – Plant Manager
Transco Railway Products Inc. – Miles City Facility
901 N Lake Avenue
P.O. Box 1222
Miles City, MT 59301

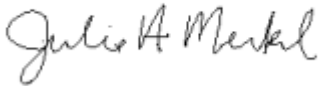
Dear Mr. Preller:

Montana Air Quality Permit #2833-07 is deemed final as of March 12, 2021, by the Department of Environmental Quality. This permit is for a railcar maintenance facility.

All conditions of the Department's Decision remain the same.

Enclosed is a copy of your permit with the final date indicated.

For the Department,



Julie A. Merkel
Permitting Services Section Supervisor
Air Quality Bureau
(406) 444-3626



Ed Warner
Lead Engineer – Permitting Services Section
Air Quality Bureau
(406) 444-2467

JM:EW
Enclosure

Montana Department of Environmental Quality
Air, Energy & Mining Division

Montana Air Quality Permit #2833-07

Transco Railway Products Inc. – Miles City Facility
901 N Lake Avenue
P.O. Box 1222
Miles City, MT 59301

March 12, 2021



MONTANA AIR QUALITY PERMIT

Issued To:
Transco Railway Products Inc.
Miles City Facility
901 N. Lake Avenue
P.O. Box 1222
Miles City, MT 59301

MAQP: #2833-07
Application Complete: 2/2/2021
Preliminary Determination Issued: 2/5/2021
Department's Decision Issued: 2/24/2021
Permit Final: 3/12/2021

A Montana Air Quality Permit (MAQP), with conditions, with conditions, is hereby granted to Transco Railway Products Inc. (Transco), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

SECTION I: Permitted Facilities

A. Plant Location

Transco's railcar maintenance facility is located in the SW¹/₄ of Section 27, Township 8 North, Range 47 East, Custer County, Montana.

B. Current Permit Action

Transco has proposed the addition of two new grit blasting units that can blast tank car interiors, a new 4-bay interior railcar painting area with two curing ovens, and the addition of a curing oven to the JBI #1 Paint Booth. The two grit blasting units would replace the two sandblasting units. This permitting action modifies the MAQP with the proposed changes and updates the emissions inventory, rule references, and permit format to current Department practices.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. Transco shall install, operate, and maintain exhaust filter chambers to control particulate emissions from JBI paint booth #1, JBI paint booth #2, and the 4-bay painting area (ARM 17.8.752).
2. Transco shall install, operate, and maintain an enclosure and a baghouse to control particulate emissions from grit blasting units #1, #2, and #3 (ARM 17.8.752).
3. Transco shall use a high-volume, low-pressure (HVLP), an airless, an air assisted airless, or a plural component spray gun when spray painting in JBI paint booth #1 and JBI paint booth #2 (ARM 17.8.749).
4. The volatile organic compound (VOC) concentration in any spray coating/paint/thinner mixture (excluding thinner used for the purpose of cleanup of spray coating equipment) shall not exceed a daily weighted average of 4.0 pounds per gallon (lb/gallon) (ARM 17.8.749 and ARM 17.8.1204).

5. All cleansers and solvents sprayed for the purpose of cleanup of equipment shall be directed into a covered container and sealed (ARM 17.8.749 and ARM 17.8.1204).
6. Transco shall limit the hours of operation and/or facility production such that the emission of VOCs will not exceed 80 TPY (ARM 17.8.749 and ARM 17.8.1204).
7. Transco shall limit the hours of operation and/or facility production such that the emission of any individual hazardous air pollutant (HAP) is less than 10 tons during any rolling 12-month time period, and the combined emissions of HAPs are less than 25 tons during any rolling 12-month time period. Any calculations used to establish HAP emissions shall be approved by the Department (ARM 17.8.749 and ARM 17.8.1204).
8. Transco shall not cause or authorize to be discharged into the atmosphere any visible fugitive emissions, from the railcar blasting, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308).
9. Transco shall not cause or authorize to be discharged into the atmosphere from any source installed after November 23, 1968, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
10. Transco shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (PM) (ARM 17.8.308).
11. Transco shall treat all unpaved portions of the streets, roads, or parking lots with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.10. (ARM 17.8.752).

B. Testing Requirements

1. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
2. The Department may require testing (ARM 17.8.105).

C. Operational and Emission Inventory Reporting Requirements

1. Transco shall supply the Department with annual production information for all emission points, as required by the Department in the annual Emission Inventory request. The request will include, but is not limited to, all sources of emissions identified in the Emission Inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. Transco shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745, that would include *the addition of a new emissions unit*, a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).
3. Transco shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. The records compiled in accordance with this permit shall be maintained by Transco as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).
4. Transco shall document, by month, the total gallons of coating, paint and, thinner used in spray-painting operations, the VOC content of each coating as applied in lbs/gal, the number of gallons of each coating employed, the total VOC emissions rate for each coating in tons per month, and, the annual year to date VOC emissions in tons, from all coating materials employed (ARM 17.8.749).
5. Transco shall document, by month, the total gallons of cleanup material employed, the VOC content of each cleanup material in lbs/gal, the number of gallons of each cleanup material employed, the total VOC emissions rate for all cleanup materials in tons per month, and the annual year to date VOC emissions in tons from all cleanup materials employed (ARM 17.8.749).
6. By the 25th day of each month, Transco shall total the VOC emissions during the previous 12 months to verify compliance with the limitation in Section II.A.6. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
7. Transco shall document, by month, the total emission of any individual HAP. By the 25th day of each month, Transco shall total the emissions of any individual HAP and the combined emission of HAPs during the previous 12 months to verify compliance with the limitation in Section II.A.7. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
8. All records compiled in accordance with this permit shall be maintained by Transco as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).
9. Transco shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification

requirements of ARM 17.8.1207. The annual certification shall be submitted with the annual emission inventory information (ARM 17.8.749 and ARM 17.8.1204).

SECTION III: General Conditions

- A. Inspection – Transco shall allow the Department’s representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (continuous emissions monitoring system (CEMS) or continuous emissions rate monitoring system (CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if Transco fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Transco of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department’s decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department’s decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department’s decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department’s decision on the application is final 16 days after the Department’s decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Transco may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit (MAQP) Analysis
Transco Railway Products Inc.
MAQP #2833-07

I. Introduction/Process Description

A. Permitted Equipment

Transco Railway Products Inc. (Transco) owns and operates the following equipment:

- 2 – JBI Paint Booths (Booth #1 and #2)
- 1 – 4-Bay Painting Area
- 3 – Grit Blasting Operations (Units #1, #2 and #3)

B. Source Description

Transco is a railcar maintenance facility and it is located in the SW¹/₄ of Section 27, Township 8 North, Range 47 East, in Custer County, Montana.

C. Permit History

On September 22, 1995, **MAQP #2833-00** was issued to Trancisco Rail Services to operate a railcar maintenance facility.

On April 17, 1997, MAQP #2833-01 was issued to Trinity Industries, Inc. (Trinity). The modification was due to a transfer of ownership from Trancisco Rail Services to Trinity. **MAQP #2833-01** replaced MAQP #2833-00.

On August 31, 1999, the Department of Environmental Quality (Department) received information from Trinity about the replacement of the existing spray painting booth and sandblasting operation at the facility. The permit was updated to allow Trinity to install JBI paint booth #1 and sandblasting unit #1. The permitted changes were accomplished in accordance with Administrative Rules of Montana (ARM) 17.8.145 (previously ARM 17.8.705(1)(r)). **MAQP #2833-02** replaced MAQP #2833-01.

On November 3, 2000, the Department received a complete Permit Application to alter MAQP #2833-02. The alteration involved the addition of a JBI paint booth, a gritblasting operation, and a sandblasting unit to the previously permitted sources at the facility. **MAQP #2833-03** replaced MAQP #2833-02.

On October 3, 2003, the Department received a request from Trinity to amend MAQP #2833-03. The permit change involved adding limitation and recordkeeping requirements to the permit to keep Trinity's emissions below 10 tons/year (TPY) of any one Hazardous Air Pollutant (HAP) and 25 TPY of combined HAPs. The limitation made the Trinity facility a synthetic minor source for Title V purposes. **MAQP #2833-04** replaced MAQP #2833-03.

On August 12, 2004, the Department received a letter from Transco requesting the Department change the corporate name on MAQP #2833-04 from Trinity to Transco.

The permitting action changed the corporate name and updated the permit to reflect current permit language and rule references used by the Department on MAQP #2833-04. **MAQP #2833-05** replaced MAQP #2833-04.

On January 4, 2012, the Department received an application to amend MAQP #2833-05, to incorporate limits which maintain potential emissions below 80 tons per year (TPY). The request was made as part of a project created by the Department to address those sources with existing federally enforceable permit limits that were established to keep potential emissions below major source permitting thresholds. The project encouraged these sources to further reduce emissions to avoid additional monitoring and increased inspections required under the Compliance Monitoring Strategy (CMS) in connection with the U. S. Environmental Protection Agency (EPA). The permitting action amended MAQP #2833-05 to incorporate limits and conditions to maintain potential emissions below 80 TPY. In addition, Transco confirmed that it no longer has an industrial boiler on site; therefore, the condition restricting use of the boiler (II.A.4.) was omitted from the permit. The permit action updated rule references, permit format, and the emissions inventory. **MAQP #2833-06** replaced MAQP #2833-05.

D. Current Permit Action

On October 28, 2021, Transco submitted a de minimis notification and associated request to update MAQP #2833-06 via administrative amendment. Transco proposed the addition of two new grit blasting units that can blast tank car interiors, a new 4-bay interior railcar painting area with two curing ovens, and the addition of a curing oven to the JBI #1 Paint Booth. The two grit blasting units would replace the two sandblasting units. While the requested update maintained existing annual emission limits on volatile organic compounds (VOC) and hazardous air pollutants (HAP), the two new grit blasting units relied on the pollution control efficiency of baghouses in the maximum potential particulate matter emission increase calculations. Upon review, the Department determined that the new federally enforceable conditions proposed with the change cannot be established without the opportunity for public review; therefore, the proposal would require the submission of a complete MAQP modification application. Transco provided additional materials which fulfilled the application completeness requirements. The application materials also identified an error in the emissions inventory calculations for grit blasting unit. The calculations utilize an emission factor from EPA AP-42 Chapter 13.2.6, Table 13.2.6-1, for abrasive blasting of metal parts controlled with a fabric filter. The Department had applied an additional control efficiency to this emission factor in a previous permitting action, when the control efficiency was already built into the value. This permitting action modifies the MAQP with the proposed changes and updates the emissions inventory, rule references, and permit format to current Department practices. **MAQP #2833-07** replaces MAQP #2833-06.

E. Response to Public Comments

Person/Group Commenting	Permit Reference	Comment	Department Response
No comments received			

F. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the ARM and are available, upon request, from the Department. Upon request, the Department will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 - General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Transco shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 - Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀

Transco must maintain compliance with all applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter (PM). (2) Under this rule, Transco shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne PM.
3. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
4. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). This facility is not an NSPS affected source because it does not meet the definition of an affected source for any NSPS subpart defined in 40 CFR Part 60.

D. ARM 17.8, Subchapter 5 - Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. Transco provided the appropriate application fee.

2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

E. ARM 17.8, Subchapter 7 - Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits -- When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify or use any air contaminant sources that have the Potential to Emit (PTE) greater than 25 TPY of any pollutant. Transco has a PTE greater than 25 TPY of Volatile Organic Compounds (VOC); therefore, an air quality permit is required.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits—Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification or use of a source. Transco submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Transco submitted an affidavit of publication of public notice for the December 22, 2020 issue of the *Miles City Star*, a newspaper of general circulation in the Town of Miles City in Custer County, as proof of compliance with the public notice requirements.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this Permit Analysis.
 8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
 9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Transco of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
 10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact Statement.
 11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
 12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
 13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
 14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.
- F. ARM 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:
1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source because it is not listed and does not have a PTE greater than 250 TPY of any air pollutant (excluding fugitive emissions).

G. ARM 17.8, Subchapter 12 - Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE > 100 TPY of any pollutant;
 - b. PTE > 10 TPY of any one HAP, PTE > 25 TPY of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE > 70 TPY of particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2833-07 for Transco, the following conclusions were made:
 - a. The facility's PTE is less than 100 TPY for any pollutant.
 - b. The facility's PTE is less than 10 TPY for any one HAP and less than 25 TPY for all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is not subject to any current NSPS.
 - e. This facility is not subject to any current NESHAP.
 - f. This source is not a Title IV affected source,
 - g. This source is not a solid waste combustion unit.
 - h. This source is not an EPA designated Title V source.
 - h. As allowed by ARM 17.8.1204(3), the Department may exempt a source from the requirement to obtain an Air Quality Operating Permit by establishing federally enforceable limitations that limit that source's PTE.

- i. In applying for an exemption under this section the owner or operator of the source shall certify to the Department that the source's PTE does not require the source to obtain an Air Quality Operating Permit.
- ii. Any source that obtains a federally enforceable limit on PTE shall annually certify that its actual emissions are less than those that would require the source to obtain an Air Quality Operating Permit.

Transco has taken federally enforceable permit limits to keep potential emissions below major source permitting thresholds. Therefore, the facility is not a major source and, thus a Title V Operating Permit is not required.

The Department determined that the annual reporting requirements contained in the permit are sufficient to satisfy this requirement.

3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness. Transco shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit as required by ARM 17.8.1204 (3)(b). The annual certification shall comply with requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual Emission Inventory information.

Based on these facts, the Department determined that Transco would be a minor source of emissions as defined under Title V.

III. BACT Determination

A BACT determination is required for each new or modified source. Transco shall install on the new, or modified, source the maximum air pollution control capability, which is technically practicable and economically feasible, except that BACT shall be utilized.

Transco intends to install two new grit blasting units that can blast tank car interiors, a new 4-bay interior railcar painting area with two curing ovens, and a new curing oven to the JBI #1 paint booth.

Grit Blasting Units

The grit blasting units would be sources of particulate matter emissions. Transco has proposed the same PM pollution control strategy for the new grit blasting units as currently utilized in the existing grit blasting unit; enclosure and baghouse. The Department concurs that this achieves BACT for this operation. Because operations are intermittent, the imposition of a measurable numerical emission standard is infeasible. Therefore, the requirement to install, operate, and maintain an enclosure and baghouse will be the enforceable condition in lieu of a numerical emission limitation.

4-Bay Interior Railcar Painting Area and Curing Ovens

Railroad tank car interiors are painted with specialized, high-solids coatings (extreme performance coatings) to resist corrosive or flammable materials. The proposed curing ovens bake the extreme performance coatings at temperatures exceeding 194°F, reducing drying time and allowing the facility to apply multiple coats of paint to the tank car interiors.

The new 4-bay painting area and curing ovens will allow the facility to apply two-coat interior coatings and reduce the curing time for one-coat interior coatings to 24-hours. Heat for the curing ovens will come from two 2.5 MMBtu/hr natural gas-fired air heaters.

High solid coatings have a lower volatile organic compound (VOC) and hazardous air pollutant (HAP) content but have higher particulate matter (PM) emissions than the coatings analyzed during initial facility permitting. Transco has provided updated PM emissions profile for the expected coatings to be used, but requests to maintain the flexibility that their current permit provides for maximum allowable VOC and HAP emissions. The daily average VOC coating limit and annual emissions cap on VOC and HAP emissions remains the same; therefore, there are no new potential emissions of VOC or HAP to the facility with this action. Transco has proposed the same PM pollution control strategy for the new 4-bay interior railcar painting area as currently utilized in the JBI paint booths; exhaust filter chambers. The Department concurs that this achieves BACT for this operation. Because operations are intermittent, the imposition of a measurable numerical emission standard is infeasible. Therefore, the requirement to install, operate, and maintain exhaust filter chambers will be the enforceable condition in lieu of a numerical emission limitation.

The natural gas heaters that provide heat for the curing of coatings will be sources of NO_x, CO, PM, SO₂, and VOC emissions. However, the maximum potential emission levels are very low for these units due to their relatively small size (7.5 MMBtu/hr combined) and use of a clean-burning fuel. Therefore, the addition of any pollution control technology would be cost prohibitive for the expected level of pollutants removed. Proper use and maintenance while burning natural gas is considered BACT.

The control options selected contain control equipment and control costs comparable to other recently permitted similar sources and are capable of achieving the appropriate emission standards.

IV. Emission Inventory

Source	Tons/year							
	NO _x	CO	VOC	Single HAP	Combined HAPs	PM	PM ₁₀	PM _{2.5}
JBI Paint Booth #1			38.0	b	b	1.2	1.2	1.2
JBI Paint Booth #2			38.0	b	b	1.2	1.2	1.2
4-Bay Painting Area			73.0	b	b	2.3	2.3	2.3
Grit Blasting Unit #1						13.1	6.3	0.6
Grit Blasting Unit #2						13.1	6.3	0.6
Grit Blasting Unit #3						13.1	6.3	0.6
Curing Ovens (7.5 MMBtu/hr combined)	3.2	2.7	0.2			0.2	0.2	0.2
Total	3.2	2.7	76.0^a	10^b	25^b	44.28	23.8	6.7

Notes:

- a The combined facility VOC emissions cannot exceed 76 TPY based on permit conditions.
- b Each painting operation can emit up to 10 TPY of an individual HAP and 25 TPY of all HAP combined, but the combined facility HAP emissions cannot exceed 10

TPY of an individual HAP and 25 TPY of all HAP combined based on permit conditions.

JBI Paint Booth #1

Process Capacity: 19,000 gal/yr (company information)
VOC Concentration: 4.0 lb VOC/gallon coating (company information)

VOC Emissions

$19,000 \text{ gal/yr} * 4.0 \text{ lb VOC/gallon coating} * 0.0005 \text{ ton/lb} = 38.00 \text{ ton/yr}$

PM= PM₁₀ = PM_{2.5} Emissions

Process Rate: 19,000 gal/yr (company information)
PM, PM₁₀ & PM_{2.5} Concentration: 12.7 lb PM/gallon coating (average product concentration: company information)
Booth Control Efficiency: 99% (manufacturers information)
 $19,000 \text{ gallon coating/yr} * 12.7 \text{ lb PM/gallon coating} * (1 - 0.99) * 0.0005 \text{ ton/lb} = 1.21 \text{ ton/yr}$

JBI Paint Booth #2

Process Capacity: 19,000 gal/yr (company information)
VOC Concentration: 4.0 lb VOC/gallon coating (company information)

VOC Emissions

$19,000 \text{ gal/yr} * 4.0 \text{ lb VOC/gallon coating} * 0.0005 \text{ ton/lb} = 38.00 \text{ ton/yr}$

PM= PM₁₀ = PM_{2.5} Emissions

Process Rate: 19,000 gal/yr (company information)
PM, PM₁₀ & PM_{2.5} Concentration: 12.7 lb PM/gallon coating (average product concentration: company information)
Booth Control Efficiency: 99% (manufacturers information)
 $19,000 \text{ gallon coating/yr} * 12.7 \text{ lb PM/gallon coating} * (1 - 0.99) * 0.0005 \text{ ton/lb} = 1.21 \text{ ton/yr}$

4-Bay Painting Area

Process Capacity: 36,500 gal/yr (company information)
VOC Concentration: 4.0 lb VOC/gallon coating (company information)

VOC Emissions

$36,500 \text{ gal/yr} * 4.0 \text{ lb VOC/gallon coating} * 0.0005 \text{ ton/lb} = 73.00 \text{ ton/yr}$

PM= PM₁₀ = PM_{2.5} Emissions

Process Rate: 36,500 gal/yr (company information)

PM, PM₁₀ & PM_{2.5} Concentration: 12.7 lb PM/gallon coating (average product concentration: company information)
 Booth Control Efficiency: 99% (manufacturers information)
 $36,500 \text{ gallon coating/yr} * 12.7 \text{ lb PM/gallon coating} * (1 - 0.99) * 0.0005 \text{ ton/lb} = 2.32 \text{ ton/yr}$

Grit Blasting Operation (individual unit calculations, permitted for 3 units)

Process Rate: 4320 lb/hour (company information)
 Hours of Operation: 8760 hr/year
 Baghouse Control Efficiency: 99%
 Blasting Media: Steel Shot/Grit

PM = PM₁₀ = PM_{2.5} Emissions

PM Emission Factor: 0.00069 lb/lb blast media (baghouse control)(AP-42 Chapter 13, Table 13.2.6-1, 9/97)
 Calculation: $4320 \text{ lb/hr} * 0.00069 \text{ lb/lb} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 13.1 \text{ ton/yr}$

PM₁₀ Emissions

PM₁₀ Emission Factor: $0.00069 * (13/27) \text{ lb/lb blast media}$ (based on ratio of uncontrolled PM₁₀/PM, AP-42 Chapter 13, Table 13.2.6-1, 9/97)
 Calculation: $4320 \text{ lb/hr} * 0.00069 \text{ lb/lb} * (13/27) * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 6.3 \text{ ton/yr}$

PM_{2.5} Emissions

PM_{2.5} Emission Factor: $0.00069 * (1.3/27) \text{ lb/lb blast media}$ (based on ratio of uncontrolled PM_{2.5}/PM, AP-42 Chapter 13, Table 13.2.6-1, 9/97)
 Calculation: $4320 \text{ lb/hr} * 0.00069 \text{ lb/lb} * (1.3/27) * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.6 \text{ ton/yr}$

Natural Gas Curing Ovens (combined 7.5 MMBtu/hr capacity)

Maximum Process Rate = $0.00735 * 10^6 \text{ cf/hr}$ (7.5 MMBtu/hr combined capacity, 1020 Btu/scf)
 Maximum Hours of Operation = 8,760 hrs/yr

Filterable PM Emissions:

Emission Factor = $1.9 \text{ lb}/10^6 \text{ cf}$ (AP 42, Table 1.4-2, all PM<1um, 7/98)
 Calculation: $(0.00735 * 10^6 \text{ cf/hr}) * (8760 \text{ hrs/yr}) * (1.9 \text{ lb}/10^6 \text{ cf}) * (\text{ton}/2000 \text{ lb}) = 0.0612 \text{ ton/yr}$

Filterable PM₁₀ Emissions:

Emission Factor = $1.9 \text{ lb}/10^6 \text{ cf}$ (AP 42, Table 1.4-2, all PM<1um, 7/98)
 Calculation: $(0.00735 * 10^6 \text{ cf/hr}) * (8760 \text{ hrs/yr}) * (1.9 \text{ lb}/10^6 \text{ cf}) * (\text{ton}/2000 \text{ lb}) = 0.06119 \text{ ton/yr}$

Filterable PM_{2.5} Emissions:

Emission Factor = $1.9 \text{ lb}/10^6 \text{ cf}$ (AP 42, Table 1.4-2, all PM<1um, 7/98)
 Calculation: $(0.00735 * 10^6 \text{ cf/hr}) * (8760 \text{ hrs/yr}) * (1.9 \text{ lb}/10^6 \text{ cf}) * (\text{ton}/2000 \text{ lb}) = 0.06119 \text{ ton/yr}$

Condensable PM_{2.5} Emissions:

Emission Factor = 5.7 lb/10⁶ cf (AP 42, Table 1.4-2, 7/98)

Calculation: (0.00735 10⁶ cf/hr) * (8760 hrs/yr) * (5.7 lb/10⁶ cf) * (ton/2000 lb) = 0.18357 ton/yr

CO Emissions:

Emission Factor = 84 lb/10⁶ cf (AP 42, Table 1.4-2, 7/98)

Calculation: (0.00735 10⁶ cf/hr) * (8760 hrs/yr) * (84 lb/10⁶ cf) * (ton/2000 lb) = 2.70529 ton/yr

NO_x Emissions:

Emission Factor = 100 lb/10⁶ cf (AP 42, Table 1.4-1, Small Boilers < 100 MMBtu/hr, 7/98)

Calculation: (0.00735 10⁶ cf/hr) * (8760 hrs/yr) * (100 lb/10⁶ cf) * (ton/2000 lb) = 3.22059 ton/yr

SO₂ Emissions:

Emission Factor = 0.6 lb/10⁶ cf (AP 42, Table 1.4-2, 7/98)

Calculation: (0.00735 10⁶ cf/hr) * (8760 hrs/yr) * (0.6 lb/10⁶ cf) * (ton/2000 lb) = 0.01932 ton/yr

VOC Emissions:

Emission Factor = 5.5 lb/10⁶ cf (AP 42, Table 1.4-2, 7/98)

Calculation: (0.00735 10⁶ cf/hr) * (8760 hrs/yr) * (5.5 lb/10⁶ cf) * (ton/2000 lb) = 0.17713 ton/yr

V. Existing Air Quality

Transco is located in the SW¹/₄ of Section 27, Township 8 North, Range 47 East, in Custer County, Montana. The air quality of this area is classified as either Better than National Standards or unclassifiable/attainment of the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. The amount of controlled emissions from the proposed permit changes will not cause an exceedance of any ambient air quality standard.

VI. Ambient Air Impact Analysis

The Department determined that there will be no negative impacts from this permitting action because there will be either no change or a net decrease in allowable levels of most pollutants. Emissions of CO and NO_x would increase with the installation of new emissions units; however, the maximum potential levels of these pollutants are very small by industrial standards. Therefore, the Department believes this action will not cause or contribute to a violation of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an

YES	NO	
		easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

Based on this analysis, the Department determined there are no taking or damaging implications associated with this permit action.

VIII. Environmental Assessment

An environmental assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.

DEPARTMENT OF ENVIRONMENTAL QUALITY
Air, Energy & Mining Division
Air Quality Bureau
P.O. Box 200901, Helena, Montana 59620
(406) 444-3490

ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Transco Railway Products Inc. – Miles City Facility
901 N. Lake Avenue
P.O. Box 1222
Miles City, MT 59301

Montana Air Quality Permit number (MAQP): #2833-07

EA Draft: 02/05/2021

EA Final: 02/24/2021

Permit Final: 03/12/2021

1. *Legal Description of Site:* SW¹/₄ of Section 27, Township 8 North, Range 47 East, Custer County, Montana
2. *Description of Project:* addition of two new grit blasting units that can blast tank car interiors, a new 4-bay interior railcar painting area with two curing ovens, and the addition of a curing oven to the JBI #1 Paint Booth.
3. *Objectives of Project:* to enhance the facility's tank car maintenance capabilities.
4. *Alternatives Considered:* In addition to the proposed action, the Department also considered the "no-action" alternative. However, Transco has complied with the requirements for the modification of their Montana air quality permit. Therefore, the "no-action" alternative was eliminated from further consideration.
5. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a BACT analysis, would be included in MAQP #2833-07.
6. *Regulatory Effects on Private Property:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.

7. *SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS*: The following comments have been prepared by the Department.

A. *Terrestrial and Aquatic Life and Habitats*

The Department determined that there would be no more than minor impacts to terrestrial and aquatic life and habitats from this permitting action because there would be either no change or a net decrease in allowable levels of most pollutants. Emissions of CO and NO_x would increase with the installation of new emissions units; however, the maximum potential levels of these pollutants are very small by industrial standards. The site is located entirely within the incorporated limits of Miles City.

B. *Water Quality, Quantity and Distribution*

The Department determined that there would be no more than minor impacts to water quality, quantity and distribution from this permitting action because there would be either no change or a net decrease in allowable levels of most pollutants. Emissions of CO and NO_x would increase with the installation of new emissions units; however, the maximum potential levels of these pollutants are very small by industrial standards. There are no planned upgrades to utilities. Nor are there any planned discharges to surface waters.

C. *Geology and Soil Quality, Stability and Moisture*

The Department determined that there would be no more than minor impacts to geology and soil quality, stability, and moisture from this permitting action because there would be less than one acre of land disturbance and the site is located entirely within the incorporated limits of Miles City. The facility would be adding new rail lines to provide rail access to the existing buildings.

D. *Vegetation Cover, Quantity, and Quality*

The Department determined that there would be no more than minor impacts to vegetation cover, quantity, and quality from this permitting action because there would be less than one acre of land disturbance and the site is located entirely within the incorporated limits of Miles City. The facility would be adding new rail lines to provide rail access to the existing buildings. There would be either no change or a net decrease in allowable levels of most pollutants. Emissions of CO and NO_x would increase with the installation of new emissions units; however, the maximum potential levels of these pollutants are very small by industrial standards.

E. *Aesthetics*

The Department determined that there would be no more than minor impacts to aesthetics from this permitting action because the facility is an existing rail car maintenance facility located entirely within the incorporated limits of Miles City. The facility would be adding new rail lines to provide rail access to the existing buildings.

F. *Air Quality*

The Department determined that there would be no more than minor impacts to air quality from this permitting action because there would be either no change or a net decrease in allowable levels of most pollutants. Emissions of CO and NO_x would increase with the installation of new emissions units; however, the maximum potential levels of these pollutants are very small by industrial standards. MAQP #2833-07 contains enforceable permit conditions which are designed to protect air quality.

G. *Unique Endangered, Fragile, or Limited Environmental Resources*

The Department determined that there would be no more than minor impacts to unique endangered, fragile, or limited environmental resources from this permitting action because there would be either no change or a net decrease in allowable levels of most pollutants. Emissions of CO and NO_x would increase with the installation of new emissions units; however, the maximum potential levels of these pollutants are very small by industrial standards. The site is located entirely within the incorporated limits of Miles City.

H. *Sage Grouse Executive Order*

The Department recognizes that the site location is not within a Greater Sage Grouse General or Core Habitat Area as defined by Executive Order No. 12-2015. The project site is entirely within the incorporated limits of Miles City.

I. *Demands on Environmental Resource of Water, Air and Energy*

The Department determined that there would be no more than minor impacts to environmental resources of water, air, and energy from this permitting action. There are no upgrades to utilities as part of the project. There would be a slight increase in natural gas and electricity usage associated with the new equipment.

J. *Historical and Archaeological Sites*

The Department determined that there would be no more than minor impacts to historical and archaeological sites from this permitting action. because there would be less than one acre of land disturbance and the site is located entirely within the incorporated limits of Miles City. The facility would be adding new rail lines to provide rail access to the existing buildings. The proposed project site is owned by Union Tank Car Company and is zoned for commercial use. If cultural materials are discovered during this project, the Montana Historical Society should be contacted.

K. *Cumulative and Secondary Impacts*

There would be minor cumulative and secondary impacts as a result of this project due to construction activities and changes in allowable emission levels. However, the source would remain a minor source with respect to air emissions and the proposed project does not change the nature of activities occurring at the facility.

8. *SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS:*
The following comments have been prepared by the Department.

A. *Social Structures and Mores*

There would be no impact to social structures and mores due to this permit action. The facility is located entirely within the incorporated limits of Miles City and as an existing rail car maintenance facility. The proposed project would be consistent with existing activity and land usage.

B. *Cultural Uniqueness and Diversity*

There would be no impact to social structures and mores due to this permit action. The facility is located entirely within the incorporated limits of Miles City and as an existing rail car maintenance facility. The proposed project would be consistent with existing activity and land usage.

C. *Local and State Tax Base and Tax Revenue*

There are no more than minor impacts expected to the local and state tax base and tax revenue. The project would not require any additional employees, nor would it be expected to result in an increase in air emission fees.

D. *Agricultural or Industrial Production*

There are no more than minor impacts expected to industrial production and no expected impacts to agricultural production. The project would expand the facility's rail car maintenance capabilities which may result in an increase in rail traffic. No agricultural land is expected to be disturbed as a result of this project.

E. *Human Health*

There are no more than minor impacts expected to human health. MAQP #2833-07 would contain enforceable conditions designed to minimize air pollutant emissions and their impact to human health. There would be either no change or a net decrease in allowable levels of most pollutants. Emissions of CO and NO_x would increase with the installation of new emissions units; however, the maximum potential levels of these pollutants are very small by industrial standards and considered minor in regulatory terms.

F. *Access to and Quality of Recreational and Wilderness Activities*

There are no accesses to recreational activities or wilderness areas near the proposed project site. Access to Bender Park, Pirogue Island State Park, and the Yellowstone River would not be impacted by the proposed project.

G. *Quantity and Distribution of Employment*

There are no more than minor expected impacts to the quantity and distribution of employment as a result of this project. While there may be some temporary employment

opportunities during construction, the number of employees at this facility is not expected to change as a result of the project.

H. Distribution of Population

There are no expected impacts to the distribution of population because there are no proposed changes to the number of employees at the facility due to the proposed project.

I. Demands for Government Services

Government services would be required for reviewing the air permit application, writing the permit, and administrative and field activities associated with monitoring compliance with the permit. However, these impacts are minor.

J. Industrial and Commercial Activity

There would be some minor expected increases in industrial and commercial activity associated with the project based on the expanded capacity of the facility to perform rail car maintenance.

K. Locally Adopted Environmental Plans and Goals

There are no known locally adopted environmental plans and goals that would be impacted by the proposed project.

L. Cumulative and Secondary Impacts

There Department did not identify any significant cumulative or secondary impacts associated with the proposed project.

Recommendation: No Environmental Impact Statement (EIS) is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: The current permitting action is for the construction and operation of new grit blasting units and a 4-bay rail car painting area. MAQP #2833-07 includes conditions and limitations to ensure the facility would operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Other groups or agencies contacted or which may have overlapping jurisdiction: None

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Quality Bureau

EA prepared by: Ed Warner
Date: January 28, 2021