

MAJOR SOURCE OPERATING PERMIT

PERMITTEE: QUALICO STEEL COMPANY, INC.

FACILITY NAME:

FACILITY/PERMIT NO.: 607-0027

LOCATION: WEBB, HOUSTON COUNTY, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: DRAFT

Effective Date: February 21, 2022

Expiration Date: February 20, 2027

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General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></p> <p>No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	Rule 335-3-16-.05(k)
<p>2. <u>Certification of Truth, Accuracy, and Completeness:</u></p> <p>Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	Rule 335-3-16-.07(a)
<p>3. <u>Inspection and Entry</u></p> <p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p> <ul style="list-style-type: none"> (a) Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements. 	Rule 335-3-16-.07(b)
<p>4. <u>Compliance Provisions</u></p>	

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<p>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</p> <p>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</p>	Rule 335-3-16-.07(c)
<p>5. <u>Compliance Certification</u></p> <p>A compliance certification shall be submitted annually within 60 days of the anniversary date of issuance of this permit.</p> <p>(a) The compliance certification shall include the following:</p> <p style="margin-left: 40px;">(1) The identification of each term or condition of this permit that is the basis of the certification;</p> <p style="margin-left: 40px;">(2) The compliance status;</p> <p style="margin-left: 40px;">(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);</p> <p style="margin-left: 40px;">(4) Whether compliance has been continuous or intermittent;</p> <p style="margin-left: 40px;">(5) Such other facts as the Department may require to determine the compliance status of the source;</p> <p>(b) The compliance certification shall be submitted to:</p> <p style="margin-left: 80px;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to:</p> <p style="margin-left: 80px;">Enforcement and Compliance Assurance Division EPA Region 4 61 Forsyth Street, SW Atlanta, GA 30303</p>	Rule 335-3-16-.07(e)

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<p>6. <u>Reopening for Cause</u></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</p> <p>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</p> <p>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</p> <p>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</p>	<p>Rule 335-3-16-.13(5)</p>
<p>7. <u>Additional Rules and Regulations</u></p> <p>This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p>8. <u>Equipment Maintenance or Breakdown</u></p> <p>(a) In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include,</p>	<p>Rule 335-3-1-.07(1), (2)</p>

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<p>but is not limited to the following:</p> <p>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</p> <p>(2) The expected length of time that the air pollution control equipment will be out of service;</p> <p>(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;</p> <p>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</p> <p>(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.</p> <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.</p>	
<p>9. <u>Operation of Capture and Control Devices</u></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p>10. <u>Obnoxious Odors</u></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically</p>	<p>Rule 335-3-1-.08</p>

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feasible.	
<p>11. <u>Fugitive Dust</u></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne:</p> <p style="padding-left: 40px;">(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic; or</p> <p style="padding-left: 40px;">(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created; or</p> <p style="padding-left: 40px;">(3) By paving; or</p> <p style="padding-left: 40px;">(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or</p> <p style="padding-left: 40px;">(5) By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.</p>	<p>Rule 335-3-4-.02</p>
<p>12. <u>Additions and Revisions</u></p> <p>Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	<p>Rule 335-3-16-.13 and .14</p>
<p>13. <u>Recordkeeping Requirements</u></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <p style="padding-left: 40px;">(1) The date, place, and time of all sampling or measurements;</p>	<p>Rule 335-3-16-.05(c)2.</p>

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<p>(2) The date analyses were performed;</p> <p>(3) The company or entity that performed the analyses;</p> <p>(4) The analytical techniques or methods used;</p> <p>(5) The results of all analyses; and</p> <p>(6) The operating conditions that existed at the time of sampling or measurement.</p>	
<p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit</p>	
<p>14. <u>Reporting Requirements</u></p> <p>(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9).</p> <p>(b) Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p>	<p>Rule 335-3-16-.05(c)3.</p>
<p>15. <u>Emission Testing Requirements</u></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of</p>	<p>Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)</p>

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<p>all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <p>(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).</p> <p>(c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p> <p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p> <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis. All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	<p>Rule 335-3-1-.04</p>
<p>23. <u>Payment of Emission Fees</u></p> <p>Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.</p>	<p>Rule 335-3-1-.04</p> <p>Rule 335-1-7-.04</p>
<p>24. <u>Other Reporting and Testing Requirements</u></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>Rule 335-3-1-.04(1)</p>

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<p>25. <u>Title VI Requirements (Refrigerants)</u></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	<p>335-3-16-.05(a)</p>
<p>26. <u>Chemical Accidental Prevention Provisions</u></p> <p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p> <p>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,</p> <p>(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</p>	<p>40 CFR Part 68</p>
<p>27. <u>Display of Permit</u></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.</p>	<p>Rule 335-3-14-.01(1)(d)</p>

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<p>28. <u>Circumvention</u></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	Rule 335-3-1-.10
<p>29. <u>Visible Emissions</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	Rule 335-3-4-.01(1)
<p>30. <u>Fuel-Burning Equipment</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.</p>	<p>Rule 335-3-4-.03</p> <p>Rule 335-3-5-.01</p>
<p>31. <u>Process Industries – General</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.</p>	Rule 335-3-4-.04
<p>32. <u>Averaging Time for Emission Limits</u></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	Rule 335-3-1-.05

Coating Operations

**Permitted Operating
Schedule:**

24 Hrs/day x 7Days/week 52 Weeks/yr = 8736 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
	Heavy Structural	VOCs	235 tons in any 12 month period for facility	Synthetic Minor PSD
		HAPs	2.6 pounds per gallon of solids	40 CFR 63 subpart M MMM

Provisos for Painting Operations

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03 "Major Source Operating Permit".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
3. This source is subject to the applicable requirements of 40 CFR part 63 National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	ADEM Admin. Code R. 335-3-11-.06(90)
<i>Section 2--Emission Standards</i>	
1. This source is subject to the applicable requirements of 40 CFR part 63 National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	ADEM Admin. Code R. 335-3-11-.06(90)
2. Emission of Volatile Organic Compounds (VOCs) from this plant wide operation shall not exceed 235 tons in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
3. Emission limits of HAPs for this source shall be limited to 2.6 pounds of HAPs per gallon of coating solids (0.31 kilograms HAPs per liter of coating solids).	ADEM Admin. Code R. 335-3-11-.06(90)
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	
1. This source is subject to the applicable requirements of 40 CFR part 63 National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	ADEM Admin. Code R. 335-3-11-.06(90)
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-16-.07
3. The VOC content by weight of each VOCs containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-1-.04

Section 4--Emission Monitoring

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| 1. | This source is subject to the applicable requirements of 40 CFR part 63 National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. | ADEM Admin. Code R. 335-3-11-.06(90) |
| 2. | The monitoring requirements in this permit shall be as required in Section 5-Recordkeeping and Reporting Requirements | |

Section 5--Recordkeeping and Reporting Requirements

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| 1. | This source is subject to the applicable requirements of 40 CFR part 63 National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products to include submissions of Semi-Annual Compliance Reports. | ADEM Admin. Code R. 335-3-11-.06(90) |
| 2. | Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information: | ADEM Admin. Code R. 335-3-11-.06(90) |
| (a) | The current copies of information provided by materials supplier. | 40 CFR 63.3930 (b) |
| (b) | The type and quantity of each VOC and HAP containing material used by the plant manufacturing. | |
| (c) | The record of the calculation of the organic HAP content for each coating using equation 2 of 40 CFR 63.3941. | 40 CFR 63.3930(c)(2) |
| (d) | The record of the calculation of the total organic HAP content for each coating, thinners, additives, and cleaning materials using equations 1, 1A through 1C, and 2 of 40 CFR 63.3951. | 40 CFR 63.3930 (c)(3) |
| (e) | The VOC and water content shall be determined from the evaluation data supplied by the manufacturer with each shipment of purchased coating and related material used. | |
| (f) | Compliance with VOC and HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the record keeping and | |

details surrounding the materials are approved in advance.

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| (g) | Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month. Records shall be retained for 5 years and made available upon request by a representative of this Department. | |
| (h) | The amount of VOCs and HAPs emitted per calendar month expressed in units of pounds and tons. | |
| (i) | The rolling 12-month total of VOCs and HAPs emitted in units of pounds and tons. | 40 CFR 63.3930 (c)(3) |
| (j) | Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance. | ADEM Admin. Code R.
335-3-1-.04 |
| 3. | A report summarizing the information in proviso 5.2 shall be submitted quarterly by the 15 day of the month following the end of the quarter, in a format approved by the Department in advance. | ADEM Admin. Code R.
335-3-1-.04 |
| 4. | A semi-annual compliance report must be submitted to fulfill the requirements listed in 40 CFR 63.3920 (a) National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. | ADEM Admin. Code R.
335-3-11-.06(90) |

Shot Blasting Operations

**Permitted Operating
Schedule:**

24 Hrs/day x 7Days/week 52 Weeks/yr = 8736 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
	5 Shot Blasting Units with baghouses	PM	$E = 3.59(P^{0.62})$	335-3-4-.04(1)
		Opacity	20% by 6 min. average	335-3-4-.01

Shot Blasting Operations

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. These units are subject to the opacity emission rate limits.	ADEM Admin. Code R. 335-3-4-.01
2. These units are subject to the particulate emission rate limits for Process Industries - General sources.	ADEM Admin. Code R. 335-3-4-.04
<i>Section 2--Emission Standards</i>	
1. These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.	ADEM Admin. Code R. 335-3-4-.01
2. These units shall not discharge into the atmosphere particulate matter in any one hour in excess of: E = 3.59 (P ^{0.62}) where P is the process weight in tons/hr	ADEM Admin. Code R. 335-3-4-.04
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	
1. Method 9 as defined in 40 CFR 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin. Code R. 335-3-1-.05
2. Method 5 as defined in 40 CFR 60, Appendix A shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.05
<i>Section 4--Emission Monitoring</i>	
1. When operating, the units shall be visually observed a minimum of once daily for visible emissions.	ADEM Admin. Code R. 335-3-16-.05(3)(a)2
2. Whenever visible emissions are observed, corrective action to minimize emissions shall be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal.	ADEM Admin. Code R. 335-3-16-.05(3)(a)2
3. The units shall be inspected for proper operation at least annually, and whenever observed emissions are greater than normal.	ADEM Admin. Code R

Federally Enforceable Provisos

Regulations

Section 5--Recordkeeping and Reporting Requirements

335-3-16-.05(3)(a)2

1. A log book of the daily visible observations required in proviso 4.1 shall be retained for at least five years and available for inspection upon request. This log book should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.

ADEM Admin. Code R.
335-3-1-.04