



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: TIFFIN MOTORHOMES, INC.

FACILITY NAME:

FACILITY/PERMIT NO.: 704-0013

LOCATION: RED BAY, FRANKLIN COUNTY, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, <u>Ala. Code</u> §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, <u>Ala. Code</u> §§ 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 10, 2020

Expiration Date: February 9, 2025

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	Federally Enforceable Provisos	Regulations	
1.	<u>Transfer</u>		
	This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code r. 335-3-1613(1)(a)5.	ADEM Admin. Code r. 335-3-1602(6)	
2.	Renewals		
	An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	ADEM Admin. Code r. 335-3-1612(2)	
	The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.		
3.	Severability Clause		
	The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	ADEM Admin. Code r. 335-3-1605(e)	
4.	Compliance		
	(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code r. 335-3-1605(f)	
	(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	ADEM Admin. Code r. 335-3-1605(g)	

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5.	Termination for Cause			
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	ADEM Admin. Code r. 335-3-1605(h)		
6.	Property Rights			
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code r. 335-3-1605(i)		
7.	Submission of Information			
	The permittee must submit to the Air Division, within 30 days or for such other reasonable time as the Air Division may set, any information that the Air Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Air Division copies of records required to be kept by this permit.	ADEM Admin. Code r. 335-3-1605(j)		
8.	Economic Incentives, Marketable Permits, and Emissions Trading			
	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.	ADEM Admin. Code r. 335-3-1605(k)		
9.	Certification of Truth, Accuracy, and Completeness			
	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.	ADEM Admin. Code r. 335-3-1607(a)		
10	. Inspection and Entry			
	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:	ADEM Admin. Code r. 335-3-1607(b)		
	(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;			

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(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.			
11. Compliance Provisions			
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	ADEM Admin. Code r. 335-3-1607(c)		
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.			
12. Compliance Certification			
The permittee shall submit a complete and accurate compliance certification by April $10^{\rm th}$ of each year for each reporting period of this permit (February $9^{\rm th}$ – February $8^{\rm th}$).	ADEM Admin. Code r. 335-3-1607(e)		
(a) The compliance certification shall include the following:			
(1) The identification of each term or condition of this permit that is the basis of the certification;			
(2) The compliance status;			
(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-1605(c) (Monitoring and Recording Keeping Requirements);			
(4) Whether compliance has been continuous or intermittent;			
(5) Such other facts as the Air Division may require to determine the compliance status of the source;			
(b) The compliance certification shall be submitted to:			

General Permit Provisos **Federally Enforceable Provisos** Regulations Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: Air Enforcement and Toxics Branch EPA Region 4 61 Forsyth Street, SW Atlanta, GA 30303 13. Reopening for Cause Under any of the following circumstances, this permit will be ADEM Admin. Code r. reopened prior to the expiration of the permit: 335-3-16-.13(5) (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. (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. (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. (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

14. Additional Rules and Regulations

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.

§22-28-16(d), <u>Code of</u> <u>Alabama 1975</u>, as amended

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Federally Enforceable Provisos Regulations 15. Equipment Maintenance or Breakdown (a) In case of shutdown of air pollution control equipment (which ADEM Admin, Code r. operates pursuant to any permit issued by the Director) for 335-3-1-.07(1),(2) necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Air Division at least (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, but is not limited to the following: (1) Identification of the specific facility to be taken out of service as well as its location and permit number; (2) The expected length of time that the air pollution control equipment will be out of service; (3) The nature and quality of emissions of air contaminants likely to occur during the shutdown period; (4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period; (5) The reasons that it would be impossible or impractical to shut down the source's operation during the maintenance period. (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 will be notified when the breakdown has been corrected. 16. Operation of Capture and Control Devices All air pollution control devices and capture systems for which §22-28-16(d), Code of this permit is issued shall be maintained and operated at all Alabama 1975, as times in a manner so as to minimize the emissions of air amended

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.

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17. Obnoxious Odors		
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 feasible.	335-3-108	
18. Fugitive Dust		
(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.		
(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:		
(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;		
(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;		
(3) By paving;		
(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.		
Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Air Division prior to utilization.		
19. Additions and Revisions		
Any modifications to this source shall comply with the modification procedures in ADEM Admin. Code r. 335-3-1613 or 335-3-1614.		
20. Recordkeeping Requirements		
(a) Records of required monitoring information of the source shall include the following:	ADEM Admin. Code r. 335-3-1605(c)2.	

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Federally Enforceable Provisos Regulations (1) The date, place, and time of all sampling or measurements; (2) The date analyses were performed: (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement. (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, Support information includes all report, or application. calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit. 21. Reporting Requirements (a) Reports to the Air Division of any required monitoring shall be ADEM Admin. Code r. submitted at least every 6 months. All instances of deviations 335-3-16-.05(c)3. from permit requirements must be clearly identified in said All required reports must be certified by a responsible official consistent with ADEM Admin. Code r. 335-3-16-.04(9). (b) Deviations from permit requirements shall be reported within 48 hours or 2 working days 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. 22. Emission Testing Requirements Each point of emission which requires testing will be provided ADEM Admin. Code r. with sampling ports, ladders, platforms, and other safety 335-3-1-.05(3) and equipment to facilitate testing performed in accordance with 335-3-1-.04(1) procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised. The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

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To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	ADEM Admin. Code r. 335-3-104
(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.	
(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 requires probe cleaning).	
(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.	
(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
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.	ADEM Admin. Code r. 335-3-104
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.	
23. Payment of Emission Fees	
(a) The permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code r. 335-1-704 according to the schedule in ADEM Admin. Code r. 335-1-705.	ADEM Admin. Code r. 335-1-704
(b) The permittee shall submit its estimate of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code r. 335-1-705.	ADEM Admin. Code r. 335-1-705
24. Other Reporting and Testing Requirements	
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.	ADEM Admin. Code r. 335-3-104(1)

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25. Title VI Requirements (Refrigerants)				
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.	ADEM Admin. Code r. 335-3-1605(a)			
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.				
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.				
26. Chemical Accidental Prevention Provisions				
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:	40 CFR Part 68			
(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.				
(b) The owner or operator shall submit one of the following:				
(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,				
(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.				
27. Display of Permit				
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 make the permit readily available for inspection by any or all persons who may request to see it.	ADEM Admin. Code r. 335-3-1401(1)(d)			

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28. <u>Circumvention</u>		
No person shall cause or permit the installation or use of any device or any means which, without resulting in the 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.	ADEM Admin. Code r. 335-3-110	
29. Visible Emissions		
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.	ADEM Admin. Code r. 335-3-401(1)	
30. Fuel-Burning Equipment		
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 ADEM Admin. Code r. 335-3-403.	ADEM Admin. Code r. 335-3-403	
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 ADEM Admin. Code r. 335-3-501.	ADEM Admin. Code r. 335-3-501	
31. Process Industries - General		
Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code R. 335-3-404.	ADEM Admin. Code r. 335-3-404	
32. Averaging Time for Emission Limits		
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.	ADEM Admin. Code r. 335-3-105	
33. Open Burning		
Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.	ADEM Admin. Code r. 335-3-301	

General Permit Provisos Regulations **Federally Enforceable Provisos** 34. Compliance Assurance Monitoring (CAM) Conditions (a) through (d) that follow are general conditions 40 CFR 64.7 applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices. (a) Operations of Approved Monitoring (1) Comencement of operation The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specific in the permit pursuant to §64.6(d). (2) Proper maintenance At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (3) Continued operation Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in

continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are

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not malfunctions.

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- (4) Response to excursions or exceedances
 - (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective

actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary followup actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results. review of operation maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

- (5) Documentation of need for improved monitoring After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (b) Quality Improvement Plan (QIP) Requirements

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- (1) Based on the results of a determination made under Section 34(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.
- (2) Elements of a QIP:
 - A. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
 - B. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
 - (i) Improved preventive maintenance practices.
 - (ii) Process operation changes.
 - (iii) Appropriate improvements to control methods.
 - (iv) Other steps appropriate to correct control performance.
 - (v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above).
- (3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

General Permit Provisos **Federally Enforceable Provisos** Regulations Following implementation of a QIP, upon any subsequent determination pursuant to 34(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the OIP is found to have: Failed to address the cause of the control device performance problems; or Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good pollution control practices for minimizing air emissions. (5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under (c) Reporting and Recordkeeping Requirements (1) General reporting requirements A. On and after the date specified in Section 34(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-16-.05(c)3.B. A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-16-.05(c)3. and the following information, as applicable: (i) Summary information on the number, duration cause (including unknown cause. applicable) of excursions or exceedances, as applicable, and the corrective actions taken; (ii) Summary information on the number, duration cause (including unknown cause, applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and (iii) A description of the actions taken to implement a QIP during the reporting period as specified in Section 34(b) above. Upon completion of a QIP, the owner or operator shall include in the next documentation summary report that implementation of the plan has been completed

and reduced the likelihood of similar levels of

excursions or exceedances occurring.

(2) General recordkeeping requirements

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Regulations

- A. The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code R. 335-3-16-.05(c)2.. The owner or operator shall maintain records of monitoring data. monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 34(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy monitoring, or records of monitoring maintenance or corrective actions).
- B. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.
- (d) Savings Provisions
 - (1) Nothing in this part shall:
 - A. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.
 - B. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.

General Permit Provisos Federally Enforceable Provisos C. Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

Particulate Sources Summary Page

Description: WW-3 (Styrofoam cyclone), WW-5 (main bag filters), WW-7 (cabinet plant bag filter), SB-11, SB-12, and SB-13 (sanding booths)

Permitted Operating Schedule: $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{365 \text{ Days}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

Emission Point No.	Description	Pollutant	Emission limit	Regulation
		NO _x	N/A	N/A
		СО	N/A	N/A
WW-3	Styrofoam cyclone	VOC	N/A	N/A
W W-3	Styroloani cyclone	SO_2	N/A	N/A
		PM	SIP	335-3-404
		HAP	N/A	N/A
		NO_x	N/A	N/A
		СО	N/A	N/A
WWW 5	Bag filter Bag filter	VOC	N/A	N/A
WW-5		SO_2	N/A	N/A
		PM	SIP	335-3-404
		HAP	N/A	N/A
		NOx	N/A	N/A
		СО	N/A	N/A
11111 /7		VOC	N/A	N/A
WW-7		SO_2	N/A	N/A
		PM	SIP	335-3-404
		HAP	N/A	N/A
		NOx	N/A	N/A
OD 11		CO	N/A	N/A
SB-11	0 1 1 1	VOC	N/A	N/A
SB-12	Sanding booths	SO_2	N/A	N/A
SB-13		PM	SIP	335-3-404
		HAP	N/A	N/A

Particulate Sources Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1.	Applicability	
	(a) These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(b) These units are subject to particulate emission rate limits for process industries general sources.	ADEM Admin. Code r. 335-3-404
	(c) WW-5 and WW-7 are subject to the applicable requirements of 40 CFR 64, Compliance Assurance Monitoring.	ADEM Admin. Code r. 335-3-1605
2.	Emission Standards	
	(a) 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. 335-3-401
	(b) These units shall not discharge into the atmosphere particulate matter in any one hour in excess of $E=3.59$ ($P^0.62$).	ADEM Admin. Code r. 335-3-404
3.	Compliance and Performance Test Methods and Procedures	
	(a) 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. 335-3-1003(1)
	(b) 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. 335-3-1003(1)
4.	Emission Monitoring	
	(a) The permittee shall maintain records of its daily visual inspections for the above emission points. The records, which may be in the form of a log or a checklist, shall be kept in a form suitable for inspection for five years. The presence of any visible emissions for any of the points shall be recorded. The permittee shall also keep a record of the corrective action that it took in the event that visible emissions are noted.	ADEM Admin. Code r. 335-3-104

Federally Enforceable Provisos	Regulations
5. Recordkeeping and Reporting Requirements	
(a) The permittee shall maintain records of its daily visual inspections for the above emission points. The records, which may be in the form of a log or a checklist, shall be kept in a form suitable for inspection for five years. The presence of any visible emissions for any of the points shall be recorded and reported in the Title V semi-annual report. The permittee shall also keep a record of the corrective action that it took in the event that visible emissions are noted.	ADEM Admin. Code r. 335-3-104

Metal Coating Summary Page

Description: metal frame painting, compartment coating (SB-28), and metal door coating

Permitted Operating Schedule:
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{365 \text{ Days}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$$

Emission Point No.	Description	Pollutant	Emission limit	Regulation
		NO_x	N/A	N/A
		CO	N/A	N/A
	Metal frame painting	VOC	230 TPY	335-3-1404
	Undercoat	SO_2	N/A	N/A
		PM	N/A	N/A
		HAP	2.6 lb/gal	335-3-1106(90)
	Compartment coating	NO_x	N/A	N/A
		СО	N/A	N/A
OD 00		VOC	230 TPY	335-3-1404
SB-28		SO_2	N/A	N/A
		PM	N/A	N/A
		HAP	2.6 lb/gal	335-3-1106(90)
		NO_x	N/A	N/A
	Metal door coating	СО	N/A	N/A
D. 1		VOC	230 TPY	335-3-1404
DA-1		SO_2	N/A	N/A
		PM	N/A	N/A
		HAP	2.6 lb/gal	335-3-1106(90)

Metal Coating

Unit Specific Provisos

		Federally Enforceable Provisos	Regulations
1.	Ap	plicability	
	(b)	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(c)	These sources are subject to the General Provisions of 40 CFR 63 subpart A.	ADEM Admin. Code r. 335-3-1106(1)
	(d)	These sources are subject to a synthetic minor source emission limit to restrict its potential to emit below the applicability threshold established at ADEM Admin. Code r. 335-3-1404, Air Permits Authorizing Construction in Clean Areas [Prevention of Significant Deterioration(PSD)].	ADEM Admin. Code r. 335-3-1404
	(e)	These sources are subject to the applicable requirements of 40 CFR 63 Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products."	ADEM Admin. Code r. 335-3-1106(90)
2.	Em	uission Standards	
	(a)	These sources are subject to the applicable emission standards of 40 CFR Part 63 Subpart MMMM, §63.3890 "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products" to include §63.3890 (b)(1).	ADEM Admin. Code r. 335-3-1106(90)
	(b)	These sources will limit organic HAP emissions to no more than 2.6 pounds per gallon coatings solids, or an alternate approved compliance option as found in 40 CFR 63.3890 (c)(1) and (2), and in Table 2, after January 2, 2007. Compliance must be demonstrated as required by 40 CFR 63.3940 and 40 CFR 63.3941.	ADEM Admin. Code r. 335-3-1106(90)
	(c)	These sources are subject to the General Compliance Requirements of 40 CFR 63.3900 (a)(1) and (b).	ADEM Admin. Code r. 335-3-1106(90)
	(d)	The emission limits of 40 CFR 63.3890 must be met by using the compliance options of 40 CFR 63.3891. Different compliance options may be applied to individual coating operations, or to multiple coating operations as a group, or to the entire affected source. Changing compliance options must be documented as required by 40 CFR 63.3930(c), and reported in the next semiannual compliance report. The emission standards may be met by using the compliant materials option of 40 CFR 63.3891 (a), or by using the emission rate without add-on controls option of 40 CFR 63.3891 (b).	ADEM Admin. Code r. 335 3 1106(90)

		Federally Enforceable Provisos	Regulations
	(e)	Emissions of Volatile Organic Compounds (VOC) from all surface coating operations including, but not limited to coating, storage, and cleanup shall not exceed 230 tons in any consecutive 12-month period based on the premise that all VOC applied is emitted.	ADEM Admin. Code r. 335-3-1404
3.	Co	mpliance and Performance Test Methods and Procedures	
	(a)	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. 335-3-1107(1)
	(b)	Initial compliance with the HAP limits must be demonstrated as required by 40 CFR 63.3940 and 3941. Continuous compliance must be demonstrated as required by 40 CFR 63.3942.	ADEM Admin. Code r. 335-3-1106(90)
	(c)	The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data of chemical content is an appropriate substitute.	ADEM Admin. Code r. 335-3-1003(1)
4.	Em	ission Monitoring	
	(a)	The monitoring requirements in this permit shall be as required in Section 5Recordkeeping and Reporting Requirements.	
5.	Re	cordkeeping and Reporting Requirements	
	(a)	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. 335-3-104
		(1) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.	
		(2) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.	
		(3) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing	

 Federally Enforceable Provisos	Regulations
(4) 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.	
(5) 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.	
(6) The amount of VOC emitted per calendar month from the coating and cleaning operations in units of pounds and tons.	
A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.	
This source must submit the general notifications required by 40 CFR 63.3910(a). This notification should include the initial notification required by 40 CFR 63.3910(b), and the notification of compliance status required by 40 CFR 63.3910.	ADEM Admin. Code r. 335-3-1106(90)
 The semi-annual compliance reports required by 40 CFR 63.3920 shall be submitted along with the required quarterly reports.	ADEM Admin. Code r. 335-3-1106(90)
This source shall maintain records required by 40 CFR Part 63 Subpart MMMM, §63.3930 "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products" to include applicable sections of §63.3930(a) through (h), §63.3930(j) and §63.3930(k).	
Records must be kept for five years as required by 40 CFR 63.3931(a) through 40 CFR 63.3931(c).	

Wood Coating Summary Page

Description: Wood Coating

Permitted Operating Schedule: $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{365 \text{ Days}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

Emission Point No.	Description	Pollutant	Emission limit	Regulation
		NO_x	N/A	N/A
GD 11	Two wood cabinet coating lines rework booths Repair booths	СО	N/A	N/A
SB-14 to 19, 24, 25, 27 to 39		VOC	230 TPY	ADEM Admin. Code r. 335-3-1404(8)
H-3 to 6		SO_2	N/A	N/A
EF-1 to 4		PM	N/A	N/A
		НАР	1.0 lb/lb solids	ADEM Admin. Code r. 335-3-1106(35)

Wood Coating

Unit Specific Provisos

		Federally Enforceable Provisos	Regulations
1.	<u>Ap</u>	plicability	
	(a)	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(b)	These sources are subject to the General Provisions of 40 CFR 63 subpart A.	ADEM Admin. Code r. 335-3-1106(1)
	(c)	These sources are subject to a synthetic minor source emission limit to restrict its potential to emit below the applicability threshold established at ADEM Admin. Code r. 335-3-1404, Air Permits Authorizing Construction in Clean Areas [Prevention of Significant Deterioration(PSD)].	ADEM Admin. Code r. 335-3-1404
	(d)	These sources are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Wood Furniture Manufacturing Operations as an "Existing Source" as listed in 40 CFR Part §63 Subpart JJ, to include 40 CFR Part §63.800(a) among other requirements.	ADEM Admin. Code r. 335-3-1106(35)
2.	Em	uission Standards	
	(a)	These sources shall not emit a weighted average of greater than 1.0 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average as listed in Table 3 of 40 CFR Part §63 Subpart JJ, among other requirements. Other operations are subject to the limits of §63.802	ADEM Admin. Code r. 335-3-1106
	(b)	Applicable sources at this facility are subject to the work practice standards of 40 CFR Part 63 Subpart JJ §63.803 "National Emission Standards for Wood Furniture Manufacturing Operations".	ADEM Admin. Code r. 335-3-1106
	(c)	Emissions of Volatile Organic Compounds (VOCs) from all sources, including, but not limited to coating, storage, cleanup, etc., shall not exceed 230 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.	ADEM Admin. Code r. 335-3-1404(8)

	Federally Enforceable Provisos	Regulations		
3.	Compliance and Performance Test Methods and Procedures			
	(a) The VOC content by weight of each VOC 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. 335-3-1003(1)		
	(b) The HAP content of each HAP 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. 335-3-1107(1)		
	(c) These sources are subject to the applicable testing methods of 40 CFR Part 63 Subpart JJ §63.805, "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.805.	ADEM Admin. Code r. 335-3-1106(35)		
	(d) These sources are subject to the applicable compliance procedures of 40 CFR 63.804.	ADEM Admin. Code r. 335-3-1106(35)		
4.	Emission Monitoring			
	(a) The monitoring requirements in this permit shall be as required in Section 5—Recordkeeping and Reporting Requirements.			
5.	Recordkeeping and Reporting Requirements			
	(a) 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. 335-3-104		
	(1) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.			
	(2) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.			
	(3) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.			
	(4) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.			

Federally Er	forceable Provisos	Regulations
	es of the VOC and HAP conta VOC content and VHAP content) ach calendar month.	
	s emitted per calendar month from erations in units of pounds and to	
	nth total of VOCs emitted from erations in units of pounds and to	
submitted each calenda	ne information in proviso 5.1 sharquarter by the 15th day of the mater, in a format approved b	onth 335-3-1106(35)
maintain the records recordkeeping require	CFR 63 subpart JJ, this facility required by §63.804, including to 63.800(d), among other requirements	the 335-3-1106(35) the
requirements of 40 ("National Emission	et to the applicable recordkee FR Part 63 Subpart JJ §63 Standards for Wood Furn ns" to include §63.806 (a) throug	.806, 335-3-1106(35)
"National Emission Manufacturing Operatio	FR Part 63 Subpart JJ §63	iture h (c),

RICE Sources Summary Page

Description: Three emergency spark ignition generators

Permitted Operating Schedule:
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{365 \text{ Days}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$$

Emission Point No.	Description	Pollutant	Emission limit	Regulation
		NO_{x}	10 g/HP-hr	ADEM Admin. Code r. 335-3-1002(88)
		('() 38'/ g/HP-hr	ADEM Admin. Code r. 335-3-1002(88)	
Gen-2, Gen-3,	Main Plant, R&D Building, Office Building,	VOC	N/A	N/A
Gen-4,	-	SO_2	N/A	N/A
		PM	N/A	N/A
		HAP	N/A	N/A

Three emergency generators Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1. <u>Ap</u>	<u>plicability</u>	
(a)	These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
(b)	These units are subject to applicable provisions of 40 CFR 63 subpart ZZZZ, the National Emissions Standards for Hazardous Air Pollutant Emissions from Stationary Reciprocating Internal Combustion Engines.	ADEM Admin. Code r. 335-3-1106(103)
(c)	These units are subject visible emissions limits.	ADEM Admin. Code r. 335-3-401
(f)	Generator 4 is subject to applicable provisions of 40 CFR 60 subpart JJJJ, the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.	ADEM Admin. Code r. 335-3-1002(88)
2. <u>En</u>	nission Standards	
(a)	As emergency stationary engines, any operation other than emergency operation, maintenance, testing, and other operation in non-emergency situations for more than 50 hours per year is prohibited.	ADEM Admin. Code r. 335-3-1106(103)
(b)	The emergency engines may be operated for any combination of purposes specified in 40 CFR 63.6640 for a maximum 100 hours per year.	ADEM Admin. Code r. 335-3-1106(103)
(c)	Generator 4 must meet the emission standards of 40 CFR 60.4233.	ADEM Admin. Code r. 335-3-1002(33)
3. <u>Co</u>	mpliance and Performance Test Methods and Procedures	
(a)	Compliance with the nitrogen oxides (NO_x) emission standards for each unit shall be determined by EPA Reference Methods 1, 2, 3, and 4 or 19, and EPA Reference Method 20 in Appendix A of 40 CFR 60. Alternate test methods may be used provided prior approval by the Air Division is granted.	ADEM Admin. Code r. 335-3-105
(b)	Compliance with the carbon monoxide (CO) emission standard for each unit shall be determined by EPA Reference Methods 1, 2, 3, and 4 or 19, and EPA Reference Method 10 in Appendix A of 40 CFR 60. Alternate test methods may be used provided prior approval by the Air Division is granted.	ADEM Admin. Code r. 335-3-105
(c)	This unit is subject to the applicable testing and procedure requirements of §60.335	ADEM Admin. Code r. 335-3-1002(33)

Federally Enforceable Provisos	Regulations
4. Emission Monitoring	
(a) A non-resetable hour meter must be used to monitor the operating hours of each emergency engine.	ADEM Admin. Code r. 335-3-1106(103)
5. Recordkeeping and Reporting Requirements	
(a) Records of the maintenance on each emergency generator shall be kept available for inspection. This maintenance will include changing oil and filter, inspecting spark plugs, and inspecting all belts and hoses annually.	ADEM Admin. Code r. 335-3-1106(103)

Gasoline Dispensing Summary Page

Description: gasoline dispensing

Permitted Operating Schedule: $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{365 \text{ Days}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

Emission Point No.	Description	Pollutant	Emission limit	Regulation
		NO_x	N/A	N/A
		СО	N/A	N/A
		VOC	N/A	N/A
	Gasoline dispensing	SO_2	N/A	N/A
		PM	N/A	N/A
		HAP	N/A	N/A

Gasoline Dispensing Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1.	Applicability	
(a)	This source is subject to the National Emission Standards for Hazardous Air Pollutants for source category: Gasoline Dispensing Facilities.	40 CFR 63 subpart CCCCCC
2.	Emission Standards	
(a)	This source is required to minimize emissions the the air of gasoline vapors by minimizing spills, cleaning spills as expeditiously as practicable, and covering open containers when not in use.	40 CFR 63 subpart CCCCCC
3.	Compliance and Performance Test Methods and Procedures	
(a)	This source is not subject to testing.	40 CFR 63.11120
4.	Emission Monitoring	
(a)	The monitoring requirements in this permit shall be as required in Section 5—Recordkeeping and Reporting Requirements.	
5.	Recordkeeping and Reporting Requirements	
(a)	Records of gasoline throughput shall be kept for five years. This source will be subject to additional requirements if the monthly throughput exceeds 10,000 gallons of gasoline.	40 CFR 63.11116

APPENDIX CAM Compliance Assurance Monitoring Requirements

CAM Plan for baghouses

	Indicator 1	Indicator 2	
I. Indicator Approach	daily visual inspections with Method 22 like procedures	Bag conditions are observed through maintenance inspections performed each calendar month.	
II. Indicator Range	If visible emissions greater than normal are observed, an inspection and appropriate maintenance will be performed within 24 hours.	Range exceeded if failure to perform inspection or take action following report of necessary maintenance.	
III. Performance Criteria 1. Data Representative	Measurements are being made at the emission point	N.A.	
2. Verification of Operation Status	N.A.	N.A.	
3. QA/QC Practices and Criteria	The observation and inspection will be performed by personnel familiar with the baghouse/cyclone operation	Trained personnel to perform inspection and maintenance.	
4. Monitoring Frequency Collection Procedure	daily Recording of data		
Averaging Period	N.A.	N.A.	