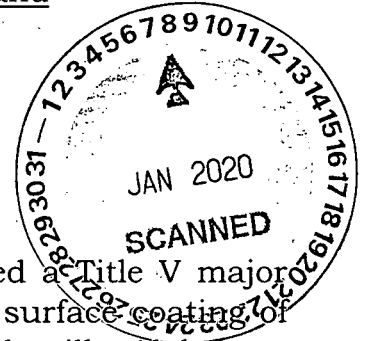


Statement of Basis
Fontaine Trailer Company
Manufacturer of Truck Trailers
713-0017
Major Source of Volatile Organic Compounds and
Hazardous Air Pollutant Emissions



Introduction

On November 1, 2019, Fontaine Trailer Company, submitted a Title V major source permit renewal application for the manufacture and surface coating of platform truck trailers (SIC #3715). Fontaine is located in Haleyville, Alabama.

During the previous Title V permit term, No Air construction permits were issued that would require incorporation into the proposed Title V permit; however, some of the terminology has changed and will be incorporated.

Fontaine constructs trailers using pre-manufactured components (e.g. axle and brake systems, lights, etc.) and unfinished raw steel, aluminum, and wood stock. Facility operations consist of frame fabrication and welding, surface coating lines, and final assembly. The facility has four production lines with three paint booths (and one touch-up booth) and three blast booth operations.

The unfinished raw stock is processed to form the structural elements of the trailer frame. Frame elements are assembled with some of the pre-manufactured parts such as axles and brake systems. The completed frames are prepared for the finishing process through one of several scenarios, but primarily through a blasting operation housed in a booth with a baghouse system for air pollution abatement. The prepared and completed frames are then primed and painted. Afterwards, pre-manufactured trailer components, such as lights, reflective tape and other elements are assembled onto the painted trailer. The completed trailer is then placed into inventory until delivery to the customer.

The surface coating of the trailer frames is as follows: Completed trailer frame assemblies are delivered to one of three paint booths in the main building. Prior to coating, non-paintable surfaces are masked using kraft paper and tape. Paint professionals using hand-held spray applicators then apply primer, paint, wax and/or undercoating to the trailers. Between painting steps, and after the final coating, the trailers remain inside the booths until dry. Each

booth is maintained at slightly below atmospheric pressure using a ventilation fan and stack. Stack emissions are vented to the atmosphere.

The regulated criteria air contaminants emitted into the atmosphere by the surface coating of the trailer frames are volatile organic compounds (VOC), which comes from the organic solvents in the paint, paint thinners, and cleanup solvents. These operations are also a source of hazardous air pollutants (HAPs) as listed in Appendix G of the ADEM Air Regulations.

Potential emission of VOCs exceeds the threshold of 100 tons per year. Therefore, Fontaine Trailer Company is considered a major source for Title V. The uncontrolled emission of VOCs also exceeds the PSD threshold of 250 tons per year. Fontaine has requested a facility-wide VOC emission limit of 235 tons per consecutive rolling 12-month period in order to avoid PSD requirements.

The potential HAP emissions from the coating operation are also emitted in such quantities as to exceed the Title III and Title V major source thresholds. The HAP emission thresholds for a major source are 10 tons for a single HAP and 25 tons for a combination of any HAPs.

The coating lines are subject to the NESHAP for the Miscellaneous Metal Parts and Products Surface Coating Category Subpart (MMMM). This regulation requires Fontaine to limit emissions of certain HAPs in their coatings and to implement certain work practices and training for operators. For existing general use sources Part §63.3890(b)(1) places a limit of 2.6 pounds per gallon on HAP emissions.

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

Fontaine has a baghouse to control particulate emissions from the shot blast booth for Line No. 2. Fontaine has a baghouse to control particulate emissions from the shot blast booth for Line No. 3. Fontaine has a baghouse to control particulate emissions from the shot blast booth for Line No. 4. The use of the baghouses reduces particulate emissions to below one ton for all of the baghouses.

Fontaine has two Aluminum wash booths that do not hold Air Permits to clean the aluminum trailer frames before painting.

The following is a list of all of the facility's sources (individual emissions units) which will be part of the facility's Title V Major Source Operating Permit:

Permit Unit No.	Description of Unit
001	Line #1 - (Axle Line; Revolution Aluminum trailers)
002	Line #2 - (Combo Line; Al/Steel Trailers)
003	Line #3 - (Combo Line; Al/Steel Trailers)
004	Line #4 - (All Steel Trailers)
005	Select Paint Booth
010	Shotblast Booth with Baghouse (Line No. 4)
011	Shotblast Booth with Baghouse (Line No. 2)
012	Shotblast Booth with Baghouse (Line No. 3)

Monitoring of Emissions

Fontaine will continue to maintain records of monthly coating usage and coating analysis. The monthly and rolling 12-month total VOC emissions will be calculated each month to show compliance with their Synthetic Minor PSD limit. These records will be submitted quarterly and maintained for at least five years.

The baghouses on the shotblast units will be monitored weekly by observing visible emissions. The weekly observations of visible emissions are performed to indicate compliance with the particulate standards. If emissions that are greater than normal are noted, corrective action to minimize the emissions shall be taken within 24 hours. Records of weekly observations will be retained for at least five years.

CAM is not applicable because potential uncontrolled emissions of criteria pollutants do not exceed 100 tons per year on any one unit with control device(s).

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Notification of the proposal of this major source operating permit will be sent to all affected states bordering Alabama.

Recommendations

I recommend that the attached permit be issued to Fontaine Trailer Company.

Kevin M. Fulmer
Chemical Branch
December, 2019



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: FONTAINE TRAILER COMPANY

**FACILITY/PERMIT
NO.:** 713-0017

LOCATION: HALEYVILLE, 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: MAY 3, 2020

Effective Date: MAY 3, 2020

Expiration Date: MAY 2, 2025

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Line #1 Revolution Aluminum Trailer Line Permit Summary

Emission Unit(s): (Line #1)
Designation No(s). in Application: 001
Description: Axle Line #1 (All Aluminum Trailer Line)

Type and quantity of fuel used:

Primary: None
Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR
HAPs	2.6 POUND HAP/GAL COATING SOLIDS	MACT. 40 CFR Part 63 Sub Part MMMM

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1—Applicability

- | | |
|--|---------------------------------------|
| 1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits." | 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 ADEM Admin. Code R. 335-3-11-.06 (90), "National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products." This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products as listed in 40 CFR Part §63 subpart MMMM. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 2--Emission Standards

- | | |
|--|---------------------------------------|
| 1. Emission of Volatile Organic Compounds (VOCs) from this facility from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 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. 335-3-14-.04(8) |
| 2. This source is subject to the applicable emissions standards of 40CFR Part 63 Subpart MMMM "Surface Coating of Miscellaneous Metal Parts and Products" including 40 CFR Part §63.3890(b)(1), which limits organic HAP emissions for each existing general use coating affected source to 2.6 pounds per gallon. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 3--Compliance and Performance Test Methods and Procedures

Federally Enforceable Provisos**Regulations**

- | | |
|--|---------------------------------------|
| 1. 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. 335-3-11-.06(35) |
| 2. 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. 335-3-1-.04 |
| 3. This source is subject to the applicable testing methods of 40CFR Part 63 Subpart M "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.33941 and 63.33942 among other requirements. | ADEM Admin. Code R. 335-3-11-.06 (xx) |

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

Section 5—Recordkeeping and Reporting Requirements

- | | |
|--|---------------------------------|
| 1. 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:

(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.

(b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month. | ADEM Admin. Code R. 335-3-1-.04 |
|--|---------------------------------|

Federally Enforceable Provisos**Regulations**

(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.	
(d) 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.	
(e) 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.	
(f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.	
(g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.	
2. This source is subject to the applicable recordkeeping requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3930(a)-(k) among other requirements.	ADEM Admin. Code R. 335-3-11-.06 (xx)
3. This source is subject to the applicable reporting requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3920(a) among other requirements.	ADEM Admin. Code R. 335-3-11-.06 (xx)
4. A report summarizing the information in proviso 5.1, 5.2 and 5.3 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.	ADEM Admin. Code R. 335-3-1-.04

Line #2 - Beam Line Permit Summary

Emission Unit(s): Line #2 -
Designation No(s). in Application: 002
Description: Line #2 Combo Trailer Line

Type and quantity of fuel used:

Primary: None
Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR
HAPs	2.6 POUND HAP/GAL COATING SOLIDS	MACT 40 CFR Part 63 Sub Part MMMM

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1—Applicability

- | | |
|--|---------------------------------------|
| 1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits." | 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 ADEM Admin. Code R. 335-3-11-.06 (90), "National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products." This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products as listed in 40 CFR Part §63 subpart MMMM. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 2--Emission Standards

- | | |
|--|---------------------------------------|
| 1. Emission of Volatile Organic Compounds (VOCs) from this facility from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 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. 335-3-14-.04(8) |
| 2. This source is subject to the applicable emissions standards of 40CFR Part 63 Subpart MMMM "Surface Coating of Miscellaneous Metal Parts and Products" including 40 CFR Part §63.3890(b)(1), which limits organic HAP emissions for each existing general use coating affected source to 2.6 pounds per gallon. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 3--Compliance and Performance Test Methods and Procedures

Federally Enforceable Provisos**Regulations**

1. 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.
2. 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.
3. This source is subject to the applicable testing methods of 40CFR Part 63 Subpart M "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.33941 and 63.33942 among other requirements.

ADEM Admin. Code
R. 335-3-11-.06(35)

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

ADEM Admin. Code
R. 335-3-11-.06 (xx)

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

Section 5—Recordkeeping and Reporting Requirements

1. 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:
 - (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
 - (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

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

Federally Enforceable Provisos**Regulations**

<p>(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.</p> <p>(d) 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.</p> <p>(e) 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.</p> <p>(f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.</p> <p>(g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.</p>	
<p>2. This source is subject to the applicable recordkeeping requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3930(a)-(k) among other requirements.</p>	<p>ADEM Admin. Code R. 335-3-11-.06 (xx)</p>
<p>3. This source is subject to the applicable reporting requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3920(a) among other requirements.</p>	<p>ADEM Admin. Code R. 335-3-11-.06 (xx)</p>
<p>4. A report summarizing the information in proviso 5.1, 5.2 and 5.3 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.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>

Line #3 – Combo (Al/Steel) Trailer Line Permit Summary

Emission Unit(s): Line #3 – Combo Trailer Line
Designation No(s). in Application: 003
Description: Line #3 (Aluminum/Steel) –

Type and quantity of fuel used:

Primary: None
Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR
HAPs	2.6 POUND HAP/GAL COATING SOLIDS	MACT 40 CFR Part 63 Sub Part MMMM

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1--Applicability

- | | |
|--|---------------------------------------|
| 1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits." | 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 ADEM Admin. Code R. 335-3-11-.06 (90), "National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products." This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products as listed in 40 CFR Part §63 subpart MMMM. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 2--Emission Standards

- | | |
|--|---------------------------------------|
| 1. Emission of Volatile Organic Compounds (VOCs) from this facility from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 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. 335-3-14-.04(8) |
| 2. This source is subject to the applicable emissions standards of 40CFR Part 63 Subpart MMMM "Surface Coating of Miscellaneous Metal Parts and Products" including 40 CFR Part §63.3890(b)(1), which limits organic HAP emissions for each existing general use coating affected source to 2.6 pounds per gallon. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 3--Compliance and Performance Test Methods and Procedures

Federally Enforceable Provisos**Regulations**

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|---|---------------------------------------|
| 1. 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. 335-3-11-.06(35) |
| 2. 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. 335-3-1-.04 |
| 3. This source is subject to the applicable testing methods of 40CFR Part 63 Subpart MMMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.33941 and 63.33942 among other requirements. | ADEM Admin. Code R. 335-3-11-.06 (xx) |

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

Section 5—Recordkeeping and Reporting Requirements

- | | |
|--|---------------------------------|
| 1. 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:

(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.

(b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month. | ADEM Admin. Code R. 335-3-1-.04 |
|--|---------------------------------|

Federally Enforceable Provisos**Regulations**

<p>(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.</p> <p>(d) 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.</p> <p>(e) 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.</p> <p>(f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.</p> <p>(g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.</p>	
<p>2. This source is subject to the applicable recordkeeping requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3930(a)-(k) among other requirements.</p>	<p>ADEM Admin. Code R. 335-3-11-.06 (xx)</p>
<p>3. This source is subject to the applicable reporting requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3920(a) among other requirements.</p>	<p>ADEM Admin. Code R. 335-3-11-.06 (xx)</p>
<p>4. A report summarizing the information in proviso 5.1, 5.2 and 5.3 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.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>

Line #4 -Steel Trailer Line Permit Summary

Emission Unit(s): Line #4 - Steel Trailer Line
Designation No(s). in Application: 004
Description: Line #4 (All Steel) -Trailer Line

Type and quantity of fuel used:

Primary: None
Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR
HAPs	2.6 POUND HAP/GAL COATING SOLIDS	MACT 40 CFR Part 63 Sub Part MMMM

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1—Applicability

- | | |
|--|---------------------------------------|
| 1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits." | 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 ADEM Admin. Code R. 335-3-11-.06 (90), "National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products." This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products as listed in 40 CFR Part §63 MMMM. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 2--Emission Standards

- | | |
|--|---------------------------------------|
| 1. Emission of Volatile Organic Compounds (VOCs) from this facility from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 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. 335-3-14-.04(8) |
| 2. This source is subject to the applicable emissions standards of 40CFR Part 63 Subpart MMMM "Surface Coating of Miscellaneous Metal Parts and Products" including 40 CFR Part §63.3890(b)(1), which limits organic HAP emissions for each existing general use coating affected source to 2.6 pounds per gallon. | ADEM Admin. Code R. 335-3-11-.06 (90) |

Section 3--Compliance and Performance Test Methods and Procedures

Federally Enforceable Provisos**Regulations**

- | | |
|--|---------------------------------------|
| 1. 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. 335-3-11-.06(35) |
| 2. 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. 335-3-1-.04 |
| 3. This source is subject to the applicable testing methods of 40CFR Part 63 Subpart M "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.33941 and 63.33942 among other requirements. | ADEM Admin. Code R. 335-3-11-.06 (xx) |

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

Section 5—Recordkeeping and Reporting Requirements

- | | |
|--|---------------------------------|
| 1. 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:

(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.

(b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month. | ADEM Admin. Code R. 335-3-1-.04 |
|--|---------------------------------|

Federally Enforceable Provisos**Regulations**

<p>(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.</p> <p>(d) 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.</p> <p>(e) 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.</p> <p>(f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.</p> <p>(g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.</p>	
<p>2. This source is subject to the applicable recordkeeping requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3930(a)-(k) among other requirements.</p>	<p>ADEM Admin. Code R. 335-3-11-.06 (xx)</p>
<p>3. This source is subject to the applicable reporting requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3920(a) among other requirements.</p>	<p>ADEM Admin. Code R. 335-3-11-.06 (xx)</p>
<p>4. A report summarizing the information in proviso 5.1, 5.2 and 5.3 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.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>

Select Paint Booth(s) Permit Summary

Emission Unit(s): Select Touch-up Paint Booth(s)
Designation No(s). in Application: 005
Description: Select Touch-up Paint Booth(s)

Type and quantity of fuel used:

Primary: None
Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR
HAPs	2.6 POUND HAP/GAL COATING SOLIDS	MACT 40 CFR Part 63 Sub Part MMMM

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1—Applicability

- | | |
|---|--|
| <p>1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits."</p> | <p>ADEM Admin. Code R. 335-3-16-.03</p> |
| <p>2. This source is subject to a PSD synthetic minor emission limitation.</p> | <p>ADEM Admin. Code R. 335-3-14-.04</p> |
| <p>3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (90), "National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products." This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products as listed in 40 CFR Part §63 MMMM.</p> | <p>ADEM Admin. Code R. 335-3-11-.06 (90)</p> |

Section 2--Emission Standards

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| <p>1. Emission of Volatile Organic Compounds (VOCs) from this facility from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.</p> | <p>ADEM Admin. Code R. 335-3-14-.04(8)</p> |
| <p>2. This source is subject to the applicable emissions standards of 40CFR Part 63 Subpart MMMM "Surface Coating of Miscellaneous Metal Parts and Products" including 40 CFR Part §63.3890(b)(1), which limits organic HAP emissions for each existing general use coating affected source to 2.6 pounds per gallon.</p> | <p>ADEM Admin. Code R. 335-3-11-.06 (90)</p> |

Section 3--Compliance and Performance Test Methods and Procedures

Federally Enforceable Provisos**Regulations**

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| 1. 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. 335-3-11-.06(35) |
| 2. 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. 335-3-1-.04 |
| 3. This source is subject to the applicable testing methods of 40CFR Part 63 Subpart M "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.33941 and 63.33942 among other requirements. | ADEM Admin. Code R. 335-3-11-.06 (xx) |

Section 4--Emission Monitoring

1. 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. 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:

(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.

(b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar | ADEM Admin. Code R. 335-3-1-.04 |
|---|---------------------------------|

Federally Enforceable Provisos**Regulations**

Federally Enforceable Provisos	Regulations
month.	
(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.	
(d) 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.	
(e) 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.	
(f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.	
(g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.	
2. This source is subject to the applicable recordkeeping requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3930(a)-(k) among other requirements.	ADEM Admin. Code R. 335-3-11-.06 (xx)
3. This source is subject to the applicable reporting requirements of 40CFR Part 63 Subpart M MMM "Surface Coating of Miscellaneous Metal Parts and Products" to include 40 CFR Part §63.3920(a) among other requirements.	ADEM Admin. Code R. 335-3-11-.06 (xx)
4. A report summarizing the information in proviso 5.1,	ADEM Admin. Code

Federally Enforceable Provisos**Regulations**

5.2 and 5.3 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.

R. 335-3-1-.04

Shotblast with Baghouse Permit Summary

Emission Unit(s): Shotblast with Baghouse Line No. 4
Designation No(s). in Application: 010
Description: Shotblast with Baghouse

Type and quantity of fuel used:

Primary: None
Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
Particulate	$E = 4.10P^{0.67}$	SIP
Opacity	Only one 6-minute average opacity greater than 20% in a 60-minute period; No 6-minute average opacity greater than 40%.	SIP

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1--Applicability

1. This unit is subject to the particulate emission rate limits for Process Industries – General Sources.
2. This unit is subject to the opacity emission rate limits.

ADEM Admin. Code
R. 335-3-4-.04

ADEM Admin. Code
R. 335-3-4-.01

Section 2--Emission Standards

1. This unit shall not discharge into the atmosphere particulate matter in any one hour in excess of...:

E = 4.10 (P^{0.67}) where P is the process weight in tons/hr
2. This unit 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-.04

ADEM Admin. Code
R. 335-3-4-.01

Section 3--Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A shall be used in the determination of the opacity of the stack emissions.
2. Method 5 or 5a 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

ADEM Admin. Code
R. 335-3-1-.05

Section 4--Emission Monitoring

1. When operating, the baghouse shall be visually observed a minimum of once weekly for visible emissions as determined by previous observations.
2. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

Federally Enforceable Provisos

Regulations

be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal.

- 3. The baghouse shall be inspected for proper operation and cleaned at least annually and whenever observed emissions are greater than normal.

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

Section 5--Recordkeeping and Reporting Requirements

- 1. A log book of the weekly 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

Shotblast with Baghouse Permit Summary

Emission Unit(s): Shotblast with Baghouse Line No. 2
Designation No(s). in Application: 011
Description: Shotblast with Baghouse

Type and quantity of fuel used:

Primary: None
 Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
PARTICULATE	$E=3.59P^{0.62}$	SIP
OPACITY	ONLY ONE 6 MINUTE AVERAGE OPACITY GREATER THAN 20% IN A 60 MINUTE PERIOD NO 6 MINUTE AVERAGE OPACITY GREATER THAN 40%.	SIP

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1--Applicability

1. This unit is subject to the particulate emission rate limits for Process Industries – General Sources.
2. This unit is subject to the opacity emission rate limits.

ADEM Admin. Code
R. 335-3-4-.04

ADEM Admin. Code
R. 335-3-4-.01

Section 2--Emission Standards

1. This unit shall not discharge into the atmosphere particulate matter in any one hour in excess of...:

ADEM Admin. Code
R. 335-3-4-.04

$E = 3.59 (P^{0.62})$ where P is the process weight in tons/hr

2. This unit 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

Section 3--Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A shall be used in the determination of the opacity of the stack emissions.
2. Method 5 or 5a 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

ADEM Admin. Code
R. 335-3-1-.05

Section 4--Emission Monitoring

1. When operating, the baghouse shall be visually observed a minimum of once weekly for visible emissions as determined by previous observations.

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

Federally Enforceable Provisos

Regulations

2. Whenever observed visible emissions are greater than normal, 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 baghouse shall be inspected for proper operation and cleaned at least annually and whenever observed emissions are greater than normal.

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

Section 5--Recordkeeping and Reporting Requirements

1. A log book of the weekly 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

Shotblast with Baghouse Permit Summary

Emission Unit(s): Line No. 3 Shotblast with Baghouse
Designation No(s). in Application: 012
Description: Line No. 3 Shotblast with Baghouse

Type and quantity of fuel used:

Primary: None
 Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
PARTICULATE	$E=3.59P^{0.62}$	SIP
OPACITY	ONLY ONE 6 MINUTE AVERAGE OPACITY GREATER THAN 20% IN A 60 MINUTE PERIOD NO 6 MINUTE AVERAGE OPACITY GREATER THAN 40%.	SIP

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1--Applicability

1. This unit is subject to the particulate emission rate limits for Process Industries – General Sources.
2. This unit is subject to the opacity emission rate limits.

ADEM Admin. Code
R. 335-3-4-.04

ADEM Admin. Code
R. 335-3-4-.01

Section 2--Emission Standards

1. This unit shall not discharge into the atmosphere particulate matter in any one hour in excess of...:

ADEM Admin. Code
R. 335-3-4-.04

$E = 3.59 (P^{0.62})$ where P is the process weight in tons/hr

2. This unit 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

Section 3--Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A shall be used in the determination of the opacity of the stack emissions.
2. Method 5 or 5a 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

ADEM Admin. Code
R. 335-3-1-.05

Section 4--Emission Monitoring

1. When operating, the baghouse shall be visually observed a minimum of once weekly for visible emissions as determined by previous observations.

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

Federally Enforceable Provisos

Regulations

2. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal.
3. The baghouse shall be inspected for proper operation and cleaned at least annually and whenever observed emissions are greater than normal.

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

ADEM Admin. Code
R.335-3-16-.05(3)(a)2

Section 5--Recordkeeping and Reporting Requirements

1. A log book of the weekly 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