

Statement of Basis
Fehrer Automotive-Alabama, LLC
(Automotive Parts Processes)
Major Source of VOC Emissions

Introduction

On December 28, 2020, Fehrer Automotive Alabama, LLC, (Fehrer), submitted a Title V major source permit renewal application for the manufacture of automotive parts (SIC # 3086). Fehrer is located in Gadsden, Alabama. This renewal permit issuance will add two permitted units. Line AL-F and Line AL-G currently have Air Permits and will be included in this renewal. Final information to complete the application was received on February 24, 2021.

Operation

The facility manufactures foam automobile seats and headrests and operates 24 hours a day, five days a week.

LINE A OPERATION (smaller line)

Fehrer has a conveyor system that takes an aluminum mold and applies a mold release spray, followed by iso and poly spray foam. The molds close and the foam expands and cures. The molds are heated with a water jacket and uses an electric water heater (thermalator). The molds are then cleaned after the product is removed. This line has a stage media filter, a metal screen and a fabric filter, to capture particulates before the air is exhausted to the atmosphere.

LINE B OPERATION (larger line)

This operation is similar to Line A, but larger.

LINE C OPERATION

This operation is smaller than the ones above and is used for smaller items.

LINE D OPERATION

This operation is smaller than A and B and is used for smaller items.

LINE E OPERATION

This line makes parts for Telsa. This line is similar to those above but utilizes two robots spraying the mold release agent before the foam is applied.

LINE F OPERATION

This line is similar to Line B with two robots and a worker manually spraying the release agent on the molds. This line has a prefilter followed by Herding filter unit.

LINE G OPERATION

This line is a circular line that has 3 identical stations with two molds each. The molds are stationary, and the robot will move between the stations applying the foam after a manual application of mold release agent. This line has a fabric filter to capture particulates before the air is exhausted to the atmosphere.

MIXING AREA

Fehrer has 5 process tanks that store 1, 2, and 3 poly used in the process. They have one mixing tank and 5 holding tanks. R10 (3100), R08 (3510), R07 (4025), R06 (2800), R05 (3500), and R02 (Mixing Tank) are the tanks in service. The mold release is stored in 250 gallon totes.

Fehrer has no boilers or generators.

STORAGE AREA

Fehrer has 8 (6 poly and 2 iso) large storage tanks that store chemicals used in the process. Normally one is used and one is on standby.

Fehrer has 6 (4 poly and 2 iso) large storage tanks that store chemicals used in the process that will be used on Line F (Hot Cure).

Regulations

Title V:

The regulated criteria air contaminants emitted into the atmosphere by the manufacturing of the automotive parts are volatile organic compounds (VOC), which come from the organic solvents in the mold release agents. The potential emissions of VOCs exceed the threshold of 100 tons per year. Therefore, Fehrer is considered a major source for Title V.

The operations are also a minor source of hazardous air pollutants (HAPs) as listed in Appendix G of the ADEM Air Regulations.

The potential HAP emissions from the coating operation would not be 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.

PSD:

Fehrer's current permits limit their VOC emissions to 235 TPY to restrict their potential emissions of criteria pollutants (VOCs) to below major source thresholds for PSD purposes. Fehrer would remain a minor source in respect to PSD after this permitting procedure.

NSPS:

Fehrer is not subject to the NSPS for storage tanks because the sizes of all tanks are below the 19,813 gallon threshold.

MACT:

There is a MACT standard for Flexible Polyurethane Foam Production (Part 63 Subpart III), but this facility is not subject because the facility is not a major source of HAP emissions.

There is a MACT standard for Flexible Polyurethane Foam Production and Fabrication Area Sources (Part 63 Subpart OOOOOO), and this facility is subject to this regulation. The facility has submitted documentation that they do not use methylene chloride in equipment cleaning and mix-head flushing, and as a mold release agent. Thus, they are in compliance with this regulation.

There are no other MACT standards, New Source Performance Standards (NSPS), or other state regulations applicable to this facility. An Air Toxics review was conducted previously; therefore, one is not required with this renewal.

CAM

Compliance Assurance Monitoring (CAM) is not applicable for the units listed herein because potential uncontrolled emissions of criteria pollutants do not exceed 100 tons per year on any one unit with a control device.

The following is a list of all 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	AL- 1
002	AL- 2
003	AL- 3
004	AL- 4
005	AL- 5
006	AL- 6
007	AL- 7

Monitoring of Emissions

Fehrer maintains records of monthly solvent usage and solvent analysis to show compliance with their synthetic minor PSD limits. These will be submitted quarterly.

Permitting Fees

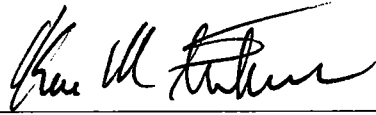
Title V major sources are subject to operating permit fees, which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

No notification of the issuance of this major source operating permit to any affected state bordering Alabama is necessary since all states are notified automatically when the public notice is issued.

Recommendations

I recommend that the attached permit be issued to Fehrer.



Kevin Fulmer
Chemical Branch
January 2021



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: FEHRER AUTOMOTIVE ALABAMA, LLC

FACILITY NAME: FEHRER

FACILITY/PERMIT NO.: 307-0049

LOCATION: GADSDEN, 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: July 1, 2021

Effective Date: July 1, 2021

Expiration Date: June 30, 2026

Alabama Department of Environmental Management

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General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>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 Rule 335-3-16-.13(1)(a)5.</p>	Rule 335-3-16-.02(6)
<p>2. <u>Renewals</u> 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. 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.</p>	Rule 335-3-16-.12(2)
<p>3. <u>Severability Clause</u> 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, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	Rule 335-3-16-.05(e)
<p>4. <u>Compliance</u></p> <p>(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.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance</p>	<p>Rule 335-3-16-.05(f)</p> <p>Rule 335-3-16-.05(g)</p>

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<p style="text-align: center;">with conditions of this permit would have required halting or reducing the permitted activity.</p>	
<p>5. <u>Termination for Cause</u> 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.</p>	Rule 335-3-16-.05(h)
<p>6. <u>Property Rights</u> The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	Rule 335-3-16-.05(i)
<p>7. <u>Submission of Information</u> The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department 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 Department copies of records required to be kept by this permit.</p>	Rule 335-3-16-.05(j)
<p>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u> No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	Rule 335-3-16-.05(k)
<p>9. <u>Certification of Truth, Accuracy, and Completeness:</u> Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	Rule 335-3-16-.07(a)
<p>10. <u>Inspection and Entry</u> Upon presentation of credentials and other documents</p>	Rule 335-3-16-.07(b)

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<p>as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p> <ul style="list-style-type: none"> (a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements. 	
<p>11. <u>Compliance Provisions</u></p> <ul style="list-style-type: none"> (a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance. (b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit. 	Rule 335-3-16-.07(c)
<p>12. <u>Compliance Certification</u></p> <p>A compliance certification shall be submitted annually within 60 days of the anniversary date of issuance of this permit.</p> <ul style="list-style-type: none"> (a) The compliance certification shall include the following: <ul style="list-style-type: none"> (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 Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements); 	Rule 335-3-16-.07(e)

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<p>(4) Whether compliance has been continuous or intermittent;</p> <p>(5) Such other facts as the Department may require to determine the compliance status of the source;</p> <p>(b) The compliance certification shall be submitted to:</p> <p>Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p>and to:</p> <p>Air Enforcement and TOXICS Branch EPA Region 4 61 Forsyth Street, SW Atlanta, GA 30303</p>	
<p>13. <u>Reopening for Cause</u></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</p> <p>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</p> <p>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</p> <p>(d) The Administrator or the Department determines that this permit must be revised or revoked to</p>	<p>Rule 335-3-16-.13(5)</p>

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<p style="text-align: center;">assure compliance with the applicable requirements.</p> <p>14. <u>Additional Rules and Regulations</u> This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p> <p>15. <u>Equipment Maintenance or Breakdown</u></p> <p>(a) In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:</p> <ol style="list-style-type: none"> (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 quantity 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 operation during the maintenance period. <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director</p>	<p>§22-28-16(d), Code of Alabama 1975, as amended</p> <p>Rule 335-3-1-.07(1), (2)</p>

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<p style="text-align: center;">within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.</p> <p>16. <u>Operation of Capture and Control Devices</u> All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p> <p>17. <u>Obnoxious Odors</u> 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.</p> <p>18. <u>Fugitive Dust</u></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. 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:</p> <p>(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;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving;</p> <p>(4) By the application of binders to the road surface at any time the road surface is</p>	<p>§22-28-16(d), Code of Alabama 1975, as amended</p> <p>Rule 335-3-1-.08</p> <p>Rule 335-3-4-.02</p>

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<p style="text-align: center;">found to allow the creation of dust emissions;</p> <p>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 Department prior to utilization.</p>	
<p>19. <u>Additions and Revisions</u> Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	<p>Rule 335-3-16-.13 and .14</p>
<p>20. <u>Recordkeeping Requirements</u></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <ol style="list-style-type: none"> (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. <p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit</p>	<p>Rule 335-3-16-.05(c)2.</p>
<p>21. <u>Reporting Requirements</u></p> <p>(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-</p>	<p>Rule 335-3-16-.05(c)3.</p>

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<p>16-.04(9).</p> <p>(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.</p>	
<p>22. <u>Emission Testing Requirements</u></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p>	<p>Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)</p>
<p>(1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).</p> <p>(3) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p> <p>(4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p>	<p>Rule 335-3-1-.04</p>

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<p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	Rule 335-3-1-.04
<p>23. <u>Payment of Emission Fees</u></p> <p>Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.</p>	Rule 335-1-7-.04
<p>24. <u>Other Reporting and Testing Requirements</u></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	Rule 335-3-1-.04(1)
<p>25. <u>Title VI Requirements (Refrigerants)</u></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	40 CFR Part 82
<p>26. <u>Chemical Accidental Prevention Provisions</u></p> <p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p>	40 CFR Part 68

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<p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p> <p style="padding-left: 40px;">(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,</p> <p style="padding-left: 40px;">(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</p>	
<p>27. <u>Display of Permit</u> This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.</p>	Rule 335-3-14-.01(1)(d)
<p>28. <u>Circumvention</u> No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	Rule 335-3-1-.10
<p>29. <u>Visible Emissions</u> Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	Rule 335-3-4-.01(1)
<p>30. <u>Fuel-Burning Equipment</u></p> <p>(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.</p> <p>(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning</p>	<p>Rule 335-3-4-.03</p> <p>Rule 335-3-5-.01</p>

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<p>equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.</p> <p>31. <u>Process Industries – General</u> Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.</p> <p>32. <u>Averaging Time for Emission Limits</u> Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p> <p>33. <u>Compliance Assurance Monitoring (CAM)</u> Conditions (a) through (d) that follow are general conditions 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.</p> <p>(a) Operation of Approved Monitoring</p> <p>(1) Commencement 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 specified in the permit pursuant to §64.6(d).</p> <p>(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.</p> <p>(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</p>	<p>Rule 335-3-4-.04</p> <p>Rule 335-3-1-.05</p> <p>40 CFR 64.7</p>

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<p>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 not malfunctions.</p> <p>(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 follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) 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 and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.</p> <p>(5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the</p>	

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<p>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 the 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.</p> <p>(b) Quality Improvement Plan (QIP) Requirements</p> <p>(1) Based on the results of a determination made under Section 33(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.</p> <p>(2) Elements of a QIP:</p> <p>A. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.</p> <p>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:</p> <p>(i) Improved preventive maintenance practices.</p> <p>(ii) Process operation changes.</p>	<p>40 CFR 64.8</p>

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<p>(iii) Appropriate improvements to control methods.</p> <p>(iv) Other steps appropriate to correct control performance.</p> <p>(v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above).</p> <p>(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.</p> <p>(4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:</p> <p>A. Failed to address the cause of the control device performance problems; or</p> <p>B. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.</p> <p>(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 the Act.</p> <p>(c) Reporting and Recordkeeping Requirements</p> <p>(1) General reporting requirements</p> <p>A. On and after the date specified in Section 33(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.</p> <p>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</p>	<p>40 CFR 64.9</p>

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<p>following information, as applicable:</p> <ul style="list-style-type: none">(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;(ii) Summary information on the number, duration and cause (including unknown cause, if 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 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. <p>(2) General recordkeeping requirements.</p> <p>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 33(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 of monitoring, or records of monitoring maintenance or corrective actions).</p> <p>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.</p> <p>(d) Savings Provisions</p> <p>(1) Nothing in this part shall:</p> <p>A. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting</p>	<p>40 CFR 64.10</p>

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<p>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.</p> <p>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.</p> <p>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.</p> <p>34. <u>Permit Shield</u></p> <p>A permit shield exists under this operating permit in accordance with ADEM Administrative Code R. 335-3-16-.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance. The permit shield is based on the accuracy of the information supplied in Section E of the application for this permit. Under this shield, it has been determined that requirements listed as non-applicable in Section E of the application are not applicable to this source.</p>	

Operating Permit Summary No. 1

Emission Unit(s):

AL Line A

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS PER 12 MONTHS	PSD SYTHETIC MINOR
HAPs	NON USE OF METHYLENE CHLORIDE	MACT-000000

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. 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
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (144), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Flexible Polyurethane Foam Production and Fabrication Area Sources as a "New Source".	ADEM Admin. Code R. 335-3-11-.06(144)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 235.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This facility will maintain a compliance certification signed by a Responsible Official stating the following: 1. "This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or other equipment cleaner which contains methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(1)." 2. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(2)."	ADEM Admin. Code R. 335-3-11-.06(144)
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416(a) and (e). This Flexible Polyurethane Foam Production Line will show compliance with the standard to include 63.11416(f).	ADEM Admin. Code R. 335-3-11-.06(144)

Section 3--Compliance and Performance Test Methods and Procedures

1. 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.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

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

ADEM Admin. Code R.
335-3-11-.06(144)

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
2. This source shall comply with the compliance and monitoring requirements set forth in the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements.

ADEM Admin. Code R.
335-3-11-.06(144)

Section 5--Recordkeeping and Reporting Requirements

1. This source shall comply with the recordkeeping requirements set forth in 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements. The facility must also keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) The statement from the Responsible Official in Section 2-2 above concerning non-use of methylene chloride.
2. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to

ADEM Admin. Code R.
335-3-11-.06(144)

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

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.
- (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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 and VOC 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.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

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

Operating Permit Summary No. 2

Emission Unit(s):

AL Line B

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS PER 12 MONTHS	PSD SYTHETIC MINOR
HAPs	NON USE OF METHYLENE CHLORIDE	MACT-000000

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. 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
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (144), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Flexible Polyurethane Foam Production and Fabrication Area Sources as a "New Source".	ADEM Admin. Code R. 335-3-11-.06(144)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 235.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This facility will maintain a compliance certification signed by a Responsible Official stating the following: 1. "This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or other equipment cleaner which contains methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(1)." 2. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(2)."	ADEM Admin. Code R. 335-3-11-.06(144)
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416(a) and (e). This Flexible Polyurethane Foam Production Line will show compliance with the standard to include 63.11416(f).	ADEM Admin. Code R. 335-3-11-.06(144)

Section 3--Compliance and Performance Test Methods and Procedures

1. 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.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

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

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
2. This source shall comply with the compliance and monitoring requirements set forth in the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements.

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 5--Recordkeeping and Reporting Requirements

1. This source shall comply with the recordkeeping requirements set forth in 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements. The facility must also keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) The statement from the Responsible Official in Section 2-2 above concerning non-use of methylene chloride.
2. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the

ADEM Admin. Code
R. 335-3-11-.06(144)

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

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.
- (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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 and VOC 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.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of

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

the identification of the exceedance.

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Operating Permit Summary No. 3

Emission Unit(s):

AL Line C

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS PER 12 MONTHS	PSD SYTHETIC MINOR
HAPs	NON USE OF METHYLENE CHLORIDE	MACT-000000

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. 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
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (144), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Flexible Polyurethane Foam Production and Fabrication Area Sources as a "New Source".	ADEM Admin. Code R. 335-3-11-.06(144)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 235.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This facility will maintain a compliance certification signed by a Responsible Official stating the following: 1. "This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or other equipment cleaner which contains methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(1)." 2. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(2)."	ADEM Admin. Code R. 335-3-11-.06(144)
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416(a) and (e). This Flexible Polyurethane Foam Production Line will show compliance with the standard to include 63.11416(f).	ADEM Admin. Code R. 335-3-11-.06(144)

Section 3--Compliance and Performance Test Methods and Procedures

1. 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.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

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

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
2. This source shall comply with the compliance and monitoring requirements set forth in the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements.

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 5--Recordkeeping and Reporting Requirements

1. This source shall comply with the recordkeeping requirements set forth in 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements. The facility must also keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) The statement from the Responsible Official in Section 2-2 above concerning non-use of methylene chloride.
2. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the

ADEM Admin. Code
R. 335-3-11-.06(144)

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

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.
- (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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 and VOC 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.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the

identification of the exceedance.

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Operating Permit Summary No. 4

Emission Unit(s):

AL Line D

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS PER 12 MONTHS	PSD SYTHETIC MINOR
HAPs	NON USE OF METHYLENE CHLORIDE	MACT-000000

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. 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
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (144), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Flexible Polyurethane Foam Production and Fabrication Area Sources as a "New Source".	ADEM Admin. Code R. 335-3-11-.06(144)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 235.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This facility will maintain a compliance certification signed by a Responsible Official stating the following: 1. "This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or other equipment cleaner which contains methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(1)." 2. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(2)."	ADEM Admin. Code R. 335-3-11-.06(144)
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416(a) and (e). This Flexible Polyurethane Foam Production Line will show compliance with the standard to include 63.11416(f).	ADEM Admin. Code R. 335-3-11-.06(144)

Section 3--Compliance and Performance Test Methods and Procedures

1. 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.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

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

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
2. This source shall comply with the compliance and monitoring requirements set forth in the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements.

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 5--Recordkeeping and Reporting Requirements

1. This source shall comply with the recordkeeping requirements set forth in 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements. The facility must also keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) The statement from the Responsible Official in Section 2-2 above concerning non-use of methylene chloride.
2. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the

ADEM Admin. Code
R. 335-3-11-.06(144)

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

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.
- (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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 and VOC 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.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of

the identification of the exceedance.

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Operating Permit Summary No. 5

Emission Unit(s):

AL Line E

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS PER 12 MONTHS	PSD SYNTHETIC MINOR
HAPs	NON USE OF METHYLENE CHLORIDE	MACT-000000

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. 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
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (144), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Flexible Polyurethane Foam Production and Fabrication Area Sources as a "New Source".	ADEM Admin. Code R. 335-3-11-.06(144)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 235.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This facility will maintain a compliance certification signed by a Responsible Official stating the following: 1. "This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or other equipment cleaner which contains methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(1)." 2. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(2)."	ADEM Admin. Code R. 335-3-11-.06(144)
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416(a) and (e). This Flexible Polyurethane Foam Production Line will show compliance with the standard to include 63.11416(f).	ADEM Admin. Code R. 335-3-11-.06(144)

Section 3--Compliance and Performance Test Methods and Procedures

1. 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.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

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

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 4--Emission Monitoring

3. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
4. This source shall comply with the compliance and monitoring requirements set forth in the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements.

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 5--Recordkeeping and Reporting Requirements

5. This source shall comply with the recordkeeping requirements set forth in 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements. The facility must also keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) The statement from the Responsible Official in Section 2-2 above concerning non-use of methylene chloride.
6. 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

ADEM Admin. Code
R. 335-3-11-.06(144)

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

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.
- (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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 and VOC 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.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of

the identification of the exceedance.

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Operating Permit Summary No. 6

Emission Unit(s):

AL Line F

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS PER 12 MONTHS	PSD SYTHETIC MINOR
HAPs	NON USE OF METHYLENE CHLORIDE	MACT-000000

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. 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
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (144), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Flexible Polyurethane Foam Production and Fabrication Area Sources as a "New Source".	ADEM Admin. Code R. 335-3-11-.06(144)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 235.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This facility will maintain a compliance certification signed by a Responsible Official stating the following: 1. "This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or other equipment cleaner which contains methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(1)." 2. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(2)."	ADEM Admin. Code R. 335-3-11-.06(144)
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416(a) and (e). This Flexible Polyurethane Foam Production Line will show compliance with the standard to include 63.11416(f).	ADEM Admin. Code R. 335-3-11-.06(144)

Section 3--Compliance and Performance Test Methods and Procedures

1. 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.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

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

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 4--Emission Monitoring

3. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
4. This source shall comply with the compliance and monitoring requirements set forth in the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements.

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 5--Recordkeeping and Reporting Requirements

5. This source shall comply with the recordkeeping requirements set forth in 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements. The facility must also keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) The statement from the Responsible Official in Section 2-2 above concerning non-use of methylene chloride.
6. 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

ADEM Admin. Code
R. 335-3-11-.06(144)

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

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.
- (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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 and VOC 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.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of

the identification of the exceedance.

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Operating Permit Summary No. 7

Emission Unit(s):

AL Line G

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS PER 12 MONTHS	PSD SYTHETIC MINOR
HAPs	NON USE OF METHYLENE CHLORIDE	MACT-000000

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. 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
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (144), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Flexible Polyurethane Foam Production and Fabrication Area Sources as a "New Source".	ADEM Admin. Code R. 335-3-11-.06(144)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 235.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This facility will maintain a compliance certification signed by a Responsible Official stating the following: 1. "This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or other equipment cleaner which contains methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(1)." 2. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR §63.1416(c)(2)."	ADEM Admin. Code R. 335-3-11-.06(144)
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416(a) and (e). This Flexible Polyurethane Foam Production Line will show compliance with the standard to include 63.11416(f).	ADEM Admin. Code R. 335-3-11-.06(144)

Section 3--Compliance and Performance Test Methods and Procedures

1. 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.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

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

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 4--Emission Monitoring

3. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
4. This source shall comply with the compliance and monitoring requirements set forth in the applicable emissions standards of 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements.

ADEM Admin. Code
R. 335-3-11-.06(144)

Section 5--Recordkeeping and Reporting Requirements

5. This source shall comply with the recordkeeping requirements set forth in 40 CFR Part 63 Subpart OOOOOO §63.11416, among other requirements. The facility must also keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) The statement from the Responsible Official in Section 2-2 above concerning non-use of methylene chloride.
6. 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

ADEM Admin. Code
R. 335-3-11-.06(144)

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

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.
- (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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 and VOC 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.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of

the identification of the exceedance.