

**ENGINEERING ANALYSIS
COVINGTON CASKET COMPANY
ANDALUSIA, ALABAMA
603-0033**

On September 30, 2020, Covington Casket submitted a Synthetic Minor Operating Permit (SMOP) application for moving their current operation from 143 N. Cotton Street, Andalusia to 400 E. Progress Drive, Andalusia. Covington has been in the original location since 1924 and their present paint booths were installed in the 1990s. Fees were paid on October 28, 2020.

OPERATION:

Covington Casket's current operations include the manufacture and surface coating of metal caskets, application of adhesive to cloth covered caskets, and powder coating of metal furniture. The standard industrial classification (SIC) code for this operation is 3995. Covington Casket currently holds a SMOP to exempt them from a MACT and major source permitting, and they wish to continue to maintain their SMOP status. The Miscellaneous Metal MACT (MMMM) would be applicable to their operations if their potential emissions were above the thresholds. The Miscellaneous Surface Coating MACT at Area Sources does not apply because Covington Casket's paint does not contain any of the metal targeted HAPs. There are no controls on the painting other than normal particulate filters.

EMISSIONS: (IN TPY)

POLLUTANT	POTENTIAL (UNCONTROLLED)	ACTUAL *	REQUESTED PERMIT LIMIT
VOCs	111	16.3	95
PM10	6	1	
ALL HAPS	22.3	0	23
XYLENE	.5	0	9
TOULENE	21.6	0	9

*** Based on October 2019 through September 2020 usage. The facility has switched to no/low HAPs coating since the original permitting.**

APPLICABLE REGULATIONS:

Covington Casket has requested to limit their facility wide VOC and HAP emissions below the Major Operating Permit thresholds. Their total VOC emissions will be restricted to 95 TPY. Their hazardous air pollutant emissions (HAP) will be restricted to 9 TPY for any individual HAP and to 23 TPY for any combination of HAP emissions. There are no MACT standards, New Source Performance Standards (NSPS), or other state regulations applicable to this

facility. An Air Toxics review was conducted on the original facility and no adverse problems were predicted. A 15 day public comment period will be held to receive comments.

RECOMMENDATIONS:

I recommend that Synthetic Minor Operating Permit (SMOP) 603-0033-X001 be issued to this facility subject to the attached provisos.

Kevin M. Fulmer
Chemical Branch
Air Division

October 2020
Date

KMF/kmf