



# SYNTHETIC MINOR OPERATING PERMIT

**PERMITTEE:** COVINGTON CASKET  
**FACILITY NAME:**  
**LOCATION:** ANDALUSIA, ALABAMA

<u>PERMIT NUMBER</u>	<u>DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE</u>
603-0033-X001	CASKET LINE NO. 1, POWDER COATING OPERATIONS, AND ADHESION OPERATIONS

*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.*

**ISSUANCE DATE:** xxxxxxxx, 2020

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Alabama Department of Environmental Management

**COVINGTON CASKET  
ANDALUSIA, ALABAMA  
(PERMIT NO. 603-0033-X001)  
PROVISOS**

1. 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.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. 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 stack emission testing at any time.
5. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
6. Nothing in this permit or conditions thereto shall negate any authority granted to the Department pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
7. 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.
8. Within 10 days of the end of each month, compliance with all provisos in this permit will be determined. These records shall be maintained for 2 years at the facility. 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.
9. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stock piles, screens, dryers, hoppers, ductwork, etc.

10. Plant or haul roads and grounds shall be maintained in a 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:
  - (A) 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;
  - (B) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
  - (C) by paving;
  - (D) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

11. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
12. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
13. Emission of Volatile Organic Compounds (VOCs) from all operations from the entire facility including, but not limited to coating, storage, cleanup, etc., shall not exceed 95.0 tons in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted to the atmosphere. If the emissions of VOCs exceed this limit, the Air Division shall be notified in writing within 10 days of the exceedance. Accurate and understandable records of consumption, which records at least the last two 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 its air permit. These records shall contain the following information:
  - (A) The type, quantity in gallons, and weight in lbs, of each VOC containing materials used each calendar month.
  - (B) The VOC content by weight (in pounds per gallon) of each VOC containing materials used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or equivalent

vendor data approved by the Department in advance. The VOC content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.

- (C) The percent by volume and percent by weight of VOCs, solids, water, and exempt VOC compounds content of each VOC containing materials used each calendar month.
- (D) Complete inventories of VOC containing materials (their usage and VOC content) shall be made at the end of each calendar month. Compliance with VOC limits shall be based upon these monthly materials 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) The amount of VOCs emitted each calendar month expressed in the units of pounds and tons.
- (F) The rolling 12-month total of VOCs emitted in the units of pounds and tons.

A monthly report summarizing the above information shall be completed and submitted at least quarterly for 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.

14. Emission of Hazardous Air Pollutants (HAPs) from all operations from the entire facility including, but not limited to coating, storage, cleanup, etc., shall not exceed 23.0 tons in any consecutive rolling 12-month period based on the premise that all HAPs applied are emitted to the atmosphere. Emission of a single Hazardous Air Pollutant (HAP) from all operations from the entire facility including, but not limited to coating, storage, cleanup, etc., shall not exceed 9.0 tons per pollutant in any consecutive rolling 12-month period based on the premise that all HAPs applied are emitted to the atmosphere. If the emissions of HAPs exceed these limits, the Air Division shall be notified in writing within 10 days of the exceedance. Accurate and understandable records of consumption, which records at least the last two 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 its air permit. These records shall contain the following information:

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- (A) The type, quantity in gallons, and weight in lbs, of each HAP containing materials used each calendar month.
- (B) The HAP content by weight (in pounds per gallon) of each coating used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or equivalent vendor data approved by the Department in advance. The HAP content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.
- (C) The percent by volume and percent by weight of HAP, solids, water, and content of each HAP containing materials used each calendar month.
- (D) Complete inventories of HAP containing materials (their usage and HAP content) shall be made at the end of each calendar month. Compliance with HAP limits shall be based upon these monthly materials use inventories. Emissions may be adjusted for HAP content of material removed from the plant as waste or returns if the record-keeping and details surrounding the materials are approved in advance.
- (E) The amount of HAPs emitted each calendar month expressed in the units of pounds and tons.
- (F) The rolling 12-month total of HAPs emitted in the units of pounds and tons.

A monthly report summarizing the above information shall be completed and submitted at least quarterly for 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

- 15. Display of Air Permit – A person who has been granted an Air permit for any article, machine, equipment, or other contrivance shall keep such permit under file or on display at all times at the site where the article, machine, equipment, or other contrivance is located and will make such a permit readily available for inspection by any and all persons who may request to see it.

xxxxxxxxxx, 2020  
DATE