

STATEMENT OF BASIS

Joy Global Conveyors Inc.
Winfield, Alabama
Marion County
710-0024

Joy Global Conveyors Inc. has applied to renew the Major Source Operating Permit for their facility in Winfield. No significant changes to the current Major Source Operating Permit were requested. This proposed Title V Major Source Operating Permit will be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit. Joy Global Conveyors manufactures conveying equipment and has a standard industrial classification code of 3535. Compliance Assurance Monitoring does not apply to this facility because the only air emission control equipment is particulate filters on the paint booths and the units do not have a potential to emit more than 100 tons per year of particulate. The current Major Source Operating Permit for this facility expires on June 13, 2021.

The only significant sources of air pollutants at this facility are Dip Tanks, Grit Blasting, and Surface Coating. This facility has two emergency generators that are not subject to 40 CFR 60 subpart JJJJ because they are less than 25 BHP.

This facility is not a major source for Prevention of Significant Deterioration. The proposed permit will retain the current VOC and HAP limits.

Dip Tanks

This facility has paint lines in Buildings 1 and 3. On these lines, parts are hung from hooks on an overhead chain that carries them into a dip tank filled with paint. After coming out of the dip tank, the parts are slowly carried over the shop floor to give the paint time to dry before the parts are removed. Building 1 also has a small batch dip tank.

Emissions Standards

This source will not be subject to 40 CFR 63 subpart MMMM, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, because the company has requested to limit hazardous air pollutants below the major source thresholds. Hazardous air pollutants will be limited to 24.5 tons per year and 9.9 tons per year for any single hazardous air pollutant for the entire facility.

The entire facility is subject to a synthetic minor prevention of significant deterioration permit limit of 245 tons of volatile organic compounds in any twelve-month period.

Expected Emissions

Expected emissions from the air sources are estimated to be 190 tons per year of volatile organic compounds and 12 tons per year of hazardous air pollutants.

Periodic Monitoring

In order to demonstrate compliance with the VOC and HAP limits, the facility will monitor their emissions through tracking the paints and chemicals used. This is found in section five of the unit specific provisos.

Abrasive Blasting

Occasionally, parts are sandblasted outside. The hand held sandblasting gun uses compressed air to shoot sand at a steel surface to prepare it for painting.

Emissions Standards

This unit is only subject to the general provisions of the Major Source Operating Permit. There are no NSPS or MACT standards that apply to sandblasting.

Expected Emissions

Air emissions from sandblasting are fugitive, and are limited by best management practices such as not sandblasting during high winds. Potential air emissions from open air grit blasting are estimated to be 16 tons per year of particulate. No measurable quantities of VOC or HAP are expected from this work.

Periodic Monitoring

Joy Global will keep records of the tons of blast media used in this area to estimate the particulate emissions for Title V reporting and fees.

Spray Coating

Equipment that is too large for the dip tanks must be painted with a paint gun. The painting is done in Bay 2.

Expected Emissions

Emissions Standards

This source will not be subject to 40 CFR 63 subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, because the company has requested to limit hazardous air pollutants below the major source thresholds. Hazardous air pollutants will be limited to 24.5 tons per year and 9.9 tons per year for any single hazardous air pollutant for the entire facility.

The entire facility is subject to a synthetic minor prevention of significant deterioration permit limit of 245 tons of volatile organic compounds in any twelve-month period.

Periodic Monitoring

In order to demonstrate compliance with the permit limits on volatile organic compound and hazardous air pollutant emissions, the facility will monitor their usage of paints, thinners, and cleanup solvents. This is found in section five of the unit specific provisos.

Permitting Fees

Title V major sources are subject to annual operating fees which are 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 issuing the attached Title V permit. The proposed monitoring is sufficient to demonstrate compliance status with applicable rules and regulations.



Hal Brock
Industrial Chemicals Section
Chemical Branch
Air Division

April 9, 2021