

## STATEMENT OF BASIS

King Kutter  
Winfield, Alabama  
Marion County  
710-0023

On February 11, 2021, the Department received an application to renew the Major Source Operating Permit for King Kutter. No changes to the current permit were requested. Emissions of Volatile Organic Compounds are limited by the permit to 245 tons in any 12-month period. The facility wishes to remain a minor source for Prevention of Significant Deterioration (PSD).

King Kutter, in Winfield, is a major source of hazardous air pollutants, which are emitted from the paints used to coat the agricultural machinery produced at this facility. King Kutter makes plows and other equipment that attaches to small tractors. This facility is subject to 40 CFR 63 subpart M MMM, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The current permit for this facility expires on June 14, 2021.

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. King Kutter has a standard industrial classification code of 3523. 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 unit does not have a potential to emit more than 100 tons per year of particulate.

The only significant sources of air pollutants at this facility are:

- 001 Primer Booth
- 002 Primary Spray Booth
- 003 Primary Dip Tank

This facility is not a major source for PSD. King Kutter will continue to have a 245 tons per year volatile organic compound limit to avoid being a major source with respect to PSD.

### **Primer Booth**

Finished equipment and components are hung with paint hooks on an overhead chain that goes through the primer booth, primary spray booth, and out of the plant to the yard where finished pieces are stored.

### **Emissions Standards:**

#### **Hazardous Air Pollutant Standard:**

This source will be subject to 40 CFR 63 subpart M MMM, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This federal standard has been adopted as ADEM Admin. Code R. 335-3-11-.06(90).

**Volatile Organic Compound Standard:**

This source is subject to the facility-wide synthetic minor PSD permit limit of 245 tons of volatile organic compounds in any twelve-month period.

**Expected Emissions**

Expected actual emissions from this unit are estimated to be 64 tons per year of volatile organic compounds. Potential emissions from this booth could be 117 tons per year of volatile organic compounds if they were not limited by the permit. These estimates are based on actual paint usage and operating hours.

**Periodic Monitoring**

King Kutter will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

**Primary Spray Booth**

After one coat of paint is applied in the primer booth, the overhead paint chain carries equipment to the primary spray booth. Several colors of paint are stored in 55 gallon drums. A solvent line flush is used when changing the color of the paint sprayed from the handheld pneumatic paint gun. A solvent still is used to recycle the line flush and cleaning solvent.

**Emissions Standards:****Hazardous Air Pollutant Standard:**

This source is subject to 40 CFR 63 subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This federal standard has been adopted as ADEM Admin. Code R. 335-3-11-.06(90).

**Volatile Organic Compound Standard:**

This source is subject to the facility-wide synthetic minor PSD permit limit of 245 tons of volatile organic compounds in any twelve-month period.

**Expected Emissions**

Expected actual emissions from this unit are estimated to be 54 tons per year of volatile organic compounds. Potential emissions from this booth are estimated to be 204 tons per year of volatile organic compounds. These estimates are based on actual paint usage and operating hours.

**Periodic Monitoring**

King Kutter will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

**Primary Dip Tank**

A small dip tank is used to paint small parts. Parts are hung with steel hooks from an overhead chain that carries them through a tank of black paint.

**Emissions Standards:**

**Hazardous Air Pollutant Standard:**

This source will 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. This federal standard has been adopted as ADEM Admin. Code R. 335-3-11-.06(90).

**Volatile Organic Compound Standard:**

This source is subject to the facility-wide synthetic minor PSD permit limit of 245 tons of volatile organic compounds in any twelve-month period.

**Expected Emissions**

Expected emissions from this unit are estimated to be 3 tons per year of volatile organic compounds. Potential emissions from this booth are estimated to be 4 tons per year of volatile organic compounds. These estimates are based on actual paint usage and operating hours.

**Periodic Monitoring**

King Kutter will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

**Permitting Fees**

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

**Affected States Notification**

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

**Recommendations**

I recommend issuing the attached Title V permit following the required public comment period and EPA review. The proposed monitoring is sufficient to demonstrate compliance status.



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Chemical Branch  
Air Division

March 31, 2021