Alabama Department of Environmental Management

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: PREMIUM PLATE SUPPLY, INC.

FACILITY NAME: PREMIUM PLATE SUPPLY, INC.

LOCATION: CHICKASAW, MOBILE COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE, OR DEVICE
503-0160-X001	Plate Processing Facility: - Plasma Cutting Table - Spray Coating Booth with Filters - Grit Blasting Booth

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 thereunder, 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: DRAFT, 2025

Alabama Department of Environmental Management

Premium Paint Supply, Inc.
Chickasaw, Alabama
(Permit No. 503-0160-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. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.

5. 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.

6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.

7. In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than **1 hour**, the person responsible for such equipment shall notify the Air Division within an additional 24 hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Air Division shall be notified when the breakdown has been corrected.

8. All deviations from requirements within this permit shall be reported to the Department within 48 hours of the deviation or by the next work day while providing a statement with regards to the date, time, duration, cause, and corrective actions taken to bring the sources back into compliance.

9. This process, including 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.

10. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit

11. Submittal 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.

12. 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.

13. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

14. 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.

15. The Air Division must be notified in writing at least 10 working 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.

    To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

    (a) 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.

    (b) 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 procedure requires probe cleaning).

    (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

    (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

    A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

    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.

16. Records will be maintained of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the process equipment and any malfunction of the air pollution control equipment. These records will be kept in a permanent form suitable for inspection and will be retained for at least five years following the date of each occurrence.

17. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

    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:

    (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.

18. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

20. 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.

21. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01, "*Control of Particulate Emissions – Visible Emissions*".

22. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), no person shall discharge into the atmosphere from any source of emission, particulate of an opacity greater than 20%, as determined by a 6-minute average. However, during one 6-minute period in any 60-minute period, a person

may discharge into the atmosphere from any source of emission, particulate of an opacity not greater than 40%.

23. The blasting and coating operations are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.04, "*Control of Particulate Emissions – Process Industries – General*".

24. In accordance with ADEM Admin. Code. r. 335-3-4-.04, particulate matter, in pounds per hour, shall not be emitted from a process in excess of $3.59P^{0.62}$, where *P* is the process weight per hour in tons per hour, as defined by ADEM Admin. Code r. 335-3-1-.02(1)(hhh).

25. Volatile organic compound (VOC) emissions from the facility shall not exceed 95 tons per rolling 12-month period.

26. Hazardous air pollutants (HAP) emissions from the facility shall not exceed 9.5 tons of any single HAP species nor 24.5 tons of all HAP species per rolling 12-month period.

27. If testing is required, Method 9 of 40 CFR Part 60 (latest edition), Appendix A-4 shall be used in the determination of the opacity of stack emissions.

28. If testing is required, Method 5 of 40 CFR Part 60 (latest edition), Appendix A-3 shall be used in the determination of particulate matter emissions.

29. If testing is required, Methods 24 and 24a of 40 CFR Part 60 (latest edition), Appendix A-7 shall be used in the determination of VOC content of paint/coating/solvent and related VOC-containing materials used at the facility. For the calculations required by Proviso 32, the Permittee may use the coating material VOC content from that material's safety data sheet.

30. If testing is required. Method 311 of 40 CFR Part 63 (latest edition), Appendix A shall be used in the determination of HAP content of paint/coating/solvent and related HAP-containing materials used at the facility. For the calculations required by Proviso 32, the Permittee may use the coating material HAP content from that material's safety data sheet.

31. The Permittee shall conduct weekly checks to determine the presence or absence of visible emissions from the facility. The weekly check must be conducted in view of the vent associated with coating operations and of the primary vent, exit or opening from the building nearest the blasting operations and must be performed while these sources are in operation.

    (a) If visible emissions are observed, corrective action shall be initiated within 1 hour. If visible emissions are still present after corrective action has been conducted, a visible emissions observation must be conducted in accordance with 40 CFR Part 60, Appendix A-4, Method 9. The visible emissions observation must last for a period of at least 12 minutes to confirm that the opacity standards are not exceeded.

32. The Permittee shall monitor and calculate the following:

(a) The type, quantity, and VOC content by weight of each VOC-containing material used in the coating operation during each calendar month.

(b) The type, quantity, and HAP content by weight of each HAP-containing material used in the coating operation during each calendar month.

(c) Each calendar month, the monthly and rolling 12-month total of VOC emitted from the facility, in tons, as follows:

$$E_{vm} = \sum_{i=1}^{p} \frac{V_i D_i C_{vi}}{2000} \qquad E_{vt} = \sum_{m=1}^{12} E_{vm}$$

Where:
E_{vm} = Total monthly VOC emitted for month *m* (tons).
E_{vt} = Rolling 12-month total VOC emitted (tons).
V_i = volume of VOC-bearing material *i* (gallons)
D_i = density of VOC-bearing material *i* (pounds/gallon)
C_{vi} = VOC content of VOC-bearing material *i* (weight percent).
p = number of different coating, solvent, thinner, reducer, diluent, or other VOC-bearing materials applied in a month.

(d) Each calendar month, the monthly and rolling 12-month total of combined HAPs and most prevalent individual HAP species emitted from the facility, in tons, as follows:

$$E_{hm} = \sum_{i=1}^{p} \frac{V_i D_i C_{hi}}{2000} \qquad E_{ht} = \sum_{m=1}^{12} E_{hm}$$

$$E_{sm} = \sum_{i=1}^{p} \frac{V_i D_i C_{si}}{2000} \qquad E_{st} = \sum_{m=1}^{12} E_{sm}$$

Where:
E_{hm} = Total monthly HAP emitted for month *m* (tons).
E_{ht} = Rolling 12-month total HAP emitted (tons).
E_{sm} = Total monthly individual HAP species (e.g., toluene) emitted for month *m* (tons).
E_{st} = Rolling 12-month individual HAP species (e.g., toluene) emitted (tons).
V_i = volume of HAP-bearing material *i* (gallons)
D_i = density of HAP-bearing material *i* (pounds/gallon)
C_{hi} = HAP content of HAP-bearing material *i* (weight percent).
C_{si} = Individual HAP species (e.g., toluene) content of HAP-bearing material *i* (weight percent).
p = number of different coating, solvent, thinner, reducer, diluent, or other VOC-bearing materials applied in a month.

33. The Permittee shall not use paints in the coating operation containing cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight or containing manganese in amounts greater than or equal to 1.0 percent by weight.

    (a) If the Permittee intends to use coatings containing MFHAP as defined in 40 CFR §63.11522, a permit determination request addressing the applicable requirements of 40 CFR Part 63, Subpart XXXXXX for spray painting affected sources must be submitted to the Department at least two months prior to the beginning of the project. The permit determination request must also include the information specified in 40 CFR §63.11519(a)(1)(i) through 40 CFR §63.11519(a)(1)(iv).

34. The Permittee shall not use abrasives in the blasting operation containing cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight or containing manganese in amounts greater than or equal to 1.0 percent by weight.

    (a) If the Permittee intends to use abrasives containing MFHAP as defined in 40 CFR §63.11522, a permit determination request addressing the applicable requirements of 40 CFR Part 63, Subpart XXXXXX for spray-painting sources must be submitted to the Department at least two months prior to the beginning of the project. The permit determination request must also include the information specified in 40 CFR §63.11519(a)(1)(i) through 40 CFR §63.11519(a)(1)(iv).

35. The Permittee must maintain up-to-date safety data sheets of each coating, solvent, thinner, or other material used in the coating operations and each abrasive used in the blasting operations.

36. The Permittee shall maintain a record of all monitoring and calculations required by this permit. This shall include all problems observed and corrective actions taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.

37. The Permittee shall maintain a record of all deviations from permit requirements. Deviation records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years

38. Quarterly reports shall be submitted to the Department as specified below:

    (a) Each report shall include the following information, by calendar month:

        i. The VOC and HAP-bearing material usage by gallons within the coating operations.

        ii. Monthly and rolling twelve-month total VOC emissions.

        iii. Monthly and rolling twelve-month total HAP emissions.

        iv. Monthly and rolling twelve-month total most prevalent individual HAP species emissions.

(b) Reports shall be quarterly and submitted on the following schedule:

Reporting Period:	*Submitted by:*
Jan. 1 – March 31	*April 30*
April. 1 – June 30	*July 31*
July 1 – Sept. 30	*Oct. 31*
Oct. 1 – Dec. 31	*Jan. 31*