

Statement of Basis
Mobis Alabama, LLC
209-0091

Introduction

On October 31, 2025, Mobis Alabama LLC, (Mobis), applied for renewal of Major Source Operating Permit (MSOP) No. 209-0091. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Administrative Code R. 335-3-16. Mobis 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 (the Department) in accordance with the terms and conditions of the permit.

This will be the second renewal of Mobis' Title V MSOP. The original Title V was issued on May 3, 2011. The current MSOP expires on May 2, 2026.

Air Permits for Unit Nos. 001, 002, 003, and 004 were originally issued on April 7, 2004. Air Permits for Unit Nos. 006 and 011 were originally issued on April 11, 2011. A permitting action on October 23, 2015, added modified Unit Nos. 001, 002, 003, 004, 005, and 007. These Air Permits were incorporated into the initial Title V Permit on May 3, 2016. The Air Permit for Unit No. 007 was modified on November 16, 2020.

The facility is located in Montgomery County, which is currently in compliance with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Mobis necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history of the facility can be found at <https://echo.epa.gov/> (search using facility ID AL0000000110100091).

This facility conducts the manufacture and surface coating of automotive parts (SIC #3089). Based on the current Title V permit application, this facility is a major source for Title V standards for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) and is a synthetic minor source with respect to the Prevention of Significant Deterioration (PSD).

Since Mobis' last Title V application, two replacement rack cleaning ovens have replaced three others that were outdated. Otherwise, no Air Permits have been issued and no units have been removed from the facility.

The following is a list of all this facility's individual emission units that will be part of this facility's Title V MSOP:

Permit Unit No.	Description of Unit
001	Main Coating Line No. 1 with RTO
002	Main Coating Line No. 2 with RTO
003	10.04 MMBTU/Hr Natural Gas Fired Boiler (BL1) 4.18 MMBTU/Hr Natural Gas Fired Boiler (BL2) 11.72 MMBTU/Hr Natural Gas Fired Boiler (BL3) 1.0 MMBTU/Hr Natural Gas Fired Rack Cleaning Oven (RC1) 1.0 MMBTU/Hr Natural Gas Fired Rack Cleaning Oven (RC2)
004	Soft-Touch Coating Line with RTO
007	293 HP Diesel Fired Fire Pump Engine (FP1) 909 HP Diesel Fired Emergency Generator (EG1) 909 HP Diesel Fired Emergency Generator (EG2) 449 HP Diesel Fired Emergency Generator (EG3)

Operations

Internal and external plastic parts are injected molded using large presses. Workpieces are conveyed through the coating process by means of a monorail system. Sometimes, the part is flame treated to promote adhesion. A coat of adhesion promoter is applied to some parts. After the adhesion step, one or more coats of primer (color basecoat) are added. Finally, one or more topcoats (clearcoats) are

applied. Water-based coatings are used on some products. Curing ovens follow the application of adhesion promoter, primer, and topcoat.

Coating Operations ((Permit Unit Nos. 001, 002, and 004)

Emissions

VOCs and HAPs are the expected pollutants to be emitted from this process. The facility wide potential emissions of VOCs are 145 TPY and HAPs are 36 TPY.

Applicable Regulations

The regulated air contaminants emitted into the atmosphere by the surface coating of the automotive parts include VOCs, which come from the organic solvents in the paint, paint thinners, and cleanup solvents. The operations are also a source of HAPs as listed in Appendix G of the ADEM air regulations. They also use adhesives that contain minor amounts of VOCs and HAPs.

The entire facility is subject to a 235 tons per year synthetic minor PSD limit for VOCs. This limit was established in Air Permit X001, X002, and X004 issued on October 23, 2015, which was subsequently incorporated into the Title V issued on May 3, 2016.

Emissions of VOCs exceed the threshold of 100 tons per year. Therefore, the facility is considered a major source for Title V.

The HAP emissions from the coating operation are also emitted in such quantities as to exceed the Title III and Title V major source thresholds. The HAP emission thresholds for a major source are 10 tons for a single HAP and 25 tons for a combination of any HAPs.

The Main Coating Line No. 1 with RTO (Unit 001), Main Coating Line No. 2 with RTO (Unit 002), and Soft-Touch Coating Line with RTO (Unit 004), are subject to the Plastic Parts and Products National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (Subpart PPPP). In order to comply with this regulation and with their synthetic minor PSD limit, regenerative thermal oxidizers (RTOs) and certain coatings are used.

Mobis has a touchup booth for small repairs. Emissions of VOCs from these booths are expected to continue to be below the trivial and insignificant (T & I) threshold; therefore, they will not be permitted.

Mobis has two paint burn-off ovens with afterburners.

Testing of Emissions

Periodic testing of VOC emissions using EPA Method 18, 25, or 25A and 24 shall be conducted at intervals not to exceed five years following the date of the initial compliance testing.

Monitoring of Emissions

Mobis will maintain records of monthly coating usage and coating analysis to show compliance with their synthetic minor PSD limits. These records will be submitted to the Department quarterly.

The coating lines are controlled by respective thermal oxidizers. These oxidizers are designed for the control of VOCs and will have the operational temperature (which was set by performance testing) monitored and recorded for compliance with their facility wide VOC limit. Due to the nature of the fuels (natural gas) and vapors in this incinerator, additional monitoring of opacity and particulates from the unit would not be required.

The monitoring for the coating process is the same as in the existing Title V Permit. This monitoring has been shown to be sufficient in the past and, therefore, no change to the monitoring is needed.

Boiler Operations

Applicable Regulations

Mobis has three natural gas fired boilers to supply heat for their operations. Some of these boilers are subject to 40 CFR Part 60, Subpart D_c, the Standards of Performance for New Stationary Sources: Small Industrial – Commercial – Institutional Steam Generating Units. These boilers are subject to New Source Performance Standards (NSPS) recordkeeping requirements. These boilers are also required to have an annual tune-up according to the requirements in 40 CFR Part 63.7540(a)(10).

No other criteria pollutants that are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

Testing of Emissions

Due to the clean burning nature of natural gas, no periodic testing of emissions is required.

Monitoring of Emissions

The boilers are natural gas fired. Due to the clean nature of burning these fuels, no monitoring of emissions will be required. However, some of these units are subject to NSPS Subpart D_c regulations, which require record keeping of fuel usage on a monthly basis.

CAM

Mobis will meet the Compliance Assurance Monitoring (CAM) requirements through compliance with the proposed post November 15, 1990, NESHAP (Plastic Parts) regulations within this Title V permit.

Following the Maximum Achievable Control Technology (MACT) requirements should be sufficient to meet the CAM monitoring for VOCs. For the thermal oxidizer, the minimum set-point temperature of the combustion chamber was set by performance testing. The temperature will be monitored and recorded continuously using a thermocouple and chart. This facility shall maintain emission records and supporting background documents to this Department and submit records that pertain to their MSOP whenever requested.

Compliance Assurance Monitoring (CAM) is not applicable for the Title V permit for the other units listed herein because potential uncontrolled emissions of criteria pollutants do not exceed 100 tons per year on any one unit with control device(s).

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

No notification of the issuance of this major source operating permit to any affected state bordering Alabama is necessary since all states are notified automatically when the public notice is issued.

Recommendations

I recommend that the attached permit be issued to Mobis following a public comment period and EPA review.

Kevin Fulmer
Chemical Branch
December 2025