

Statement of Basis  
Fehrer Automotive-Alabama, LLC  
307-0049

**Introduction**

On December 22, 2025, Fehrer Automotive-Alabama, LLC, (Fehrer), applied for renewal of Major Source Operating Permit (MSOP) No. 307-0049. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Administrative Code R. 335-3-16. Fehrer 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 Fehrer's Title V MSOP. The original Title V was issued on July 1, 2016. The current MSOP expires on June 30, 2026.

Air Permits for Unit Nos. 001, 002, 003, and 004 were originally issued on December 6, 2013, and modified on April 1, 2015, in preparation of changing to a Title V permit. An Air Permit for Unit No. 005 was originally issued on June 12, 2015. These Air Permits were incorporated into the initial Title V Permit on July 1, 2016. An Air Permit for Unit No. 006 was originally issued on January 18, 2017. An Air Permit for Unit No. 007 was originally issued on October 25, 2019. These Air Permits were incorporated into the Title V Permit on July 1, 2021. An Air Permit for Unit No. 008 was originally issued on February 20, 2024, and will be incorporated into the Title V with this issuance.

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

There are no current or ongoing enforcement actions against Fehrer 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 AL0000000105500049).

This facility conducts the manufacture of automotive parts (SIC #3086). Based on the current Title V permit application, this facility is a major source for Title V standards for volatile organic compounds

(VOCs) and is a synthetic minor source with respect to the Prevention of Significant Deterioration (PSD).

Since Fehrer's last Title V application, one additional line, Line AL-I, has been added and will be incorporated into this permit. 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:

<b>Permit Unit No.</b>	<b>Description of Unit</b>
<b>001</b>	<b>AL- Line A</b>
<b>002</b>	<b>AL- Line B</b>
<b>003</b>	<b>AL- Line C</b>
<b>004</b>	<b>AL- Line D</b>
<b>005</b>	<b>AL- Line E</b>
<b>006</b>	<b>AL- Line F</b>
<b>007</b>	<b>AL- Line G</b>
<b>008</b>	<b>AL- Line I</b>

### **Operations**

Fehrer has a conveyor system that takes an aluminum mold and applies a mold release spray, followed by iso and poly spray foam. The molds close and the foam expands and cures. The molds are heated with a water jacket and use an electric water heater (Thermarator). The molds are then cleaned after the product is removed. These lines have various filters to capture particulates before the air is exhausted to the atmosphere.

### **Mold Release Operations (Permit Unit Nos. 001, 002, 003, 004, 005, 006, 007, and 008)**

#### *Emissions*

VOCs are the expected pollutants to be emitted from this process. The facility wide potential emissions of VOCs are 371 TPY.

## *Applicable Regulations*

### Title V:

The regulated criteria air contaminants emitted into the atmosphere by the manufacturing of the automotive parts are VOCs, which come from the organic solvents in the mold release agents. The potential emissions of VOCs exceed the threshold of 100 tons per year; therefore, Fehrer is considered a major source for Title V.

The operations are also a minor source of hazardous air pollutants (HAPs) as listed in Appendix G of the ADEM Air Regulations.

The potential HAP emissions from the coating operation would not be 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.

### PSD:

Fehrer's current permits limit their VOC emissions to restrict their potential emissions of criteria pollutants to below major source thresholds for PSD purposes. Fehrer would remain a minor source in respect to PSD after this permitting process.

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 April 1, 2015, which was subsequently incorporated into the Title V issued on July 1, 2016.

### NSPS:

Fehrer is not subject to the New Source Performance Standards (NSPS) Subpart D for storage tanks because the sizes of all tanks are below the 19,813-gallon threshold.

### NESHAP:

Fehrer is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation, Flexible Polyurethane Foam Production and Fabrication Area Sources (Part 63 Subpart OOOOOO). The facility has submitted documentation that they do not use methylene chloride in equipment cleaning and mix-head flushing, or as a mold release agent.

There is an additional standard for Flexible Polyurethane Foam Production (Part 63 Subpart III), but Fehrer is not subject because the facility is not a major source of HAP emissions.

There are no other NESHAP, NSPS, or other state regulations applicable to this facility. An Air Toxics review was conducted previously; therefore, one is not required with this renewal.

*Testing of Emissions*

There is no required testing of emission sources.

*Monitoring of Emissions*

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

The monitoring for the production 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.

**CAM**

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**

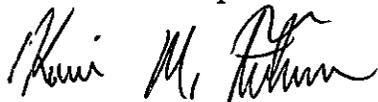
Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

**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 Fehrer following a public comment period and EPA review.



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Kevin Fulmer  
Chemical Branch  
February 2026