

# AIR PERMIT

**PERMITTEE:** SANDERS LEAD COMPANY, INC.  
**FACILITY NAME:** SANDERS LEAD COMPANY  
**LOCATION:** TROY, PIKE COUNTY, ALABAMA

<u>PERMIT NUMBER</u>	<u>DESCRIPTION OF EQUIPMENT, ARTICLE, OR DEVICE</u>
210-0005-X036	Emergency Backup Engine

*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 there under, 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: May 25, 2023**

**SANDERS LEAD COMPANY, INC.**  
**TROY, ALABAMA**  
**(PERMIT NO. 210-0005-X036)**  
**PROVISOS**

**General Permit 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. 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.
5. 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.
6. In the event there is a breakdown of air pollution control or process 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 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.
7. 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.
8. 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.

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9. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
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.

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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 two 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.

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21. 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.
22. The permittee shall submit an annual compliance certification to the Department no later than 60 days following the anniversary of the permittee's Title V permit. The compliance certification shall include the following:
  - (a) The compliance certification shall include the following:
    - a. The identification of each term or condition of this permit that is the basis of the certification;
    - b. The compliance status;
    - c. The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);
    - d. Whether compliance has been continuous or intermittent; and
    - e. Such other facts as the Department may require in order to determine the compliance status of the source.
  - (b) The compliance certification shall be submitted to:

Alabama Department of Environmental Management  
Air Division  
P.O. Box 301463  
Montgomery, AL 36130-1463

**Emergency Backup Engine**

	<b>Regulations</b>
<p><b>Applicability</b></p> <ol style="list-style-type: none"> <li>1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16, “<i>Major Source Operating Permits</i>”.</li> <li>2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01, “<i>Control of Particulate Emissions – Visible Emissions</i>”.</li> <li>3. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart A, “<i>General Provisions</i>” as listed in Table 8 to 40 CFR Part 63, Subpart ZZZZ, “<i>NESHAP for Stationary Reciprocating Internal Combustion Engines</i>”</li> </ol>	<p>Rule 335-3-16-.03</p> <p>Rule 335-3-4-.01</p> <p>Rule 335-3-10-.02(87) 40 CFR §63.6580</p>
<p><b>Emission Standards</b></p> <ol style="list-style-type: none"> <li>1. The engine shall meet the following opacity standards:           <ol style="list-style-type: none"> <li>(a) Except for one 6-minute period during any 60-minute period, the engines shall not discharge into the atmosphere particulate that results in an opacity greater than 20%, as determined by a 6-minute average.</li> <li>(b) At no time shall the engines discharge into the atmosphere particulate that results in an opacity greater than 40%, as determined by a 6-minute average.</li> </ol> </li> </ol>	<p>Rule 335-3-4-.01(1)(a)</p> <p>Rule 335-3-4-.01(1)(b)</p>
<p><b>Compliance and Performance Test Methods and Procedures</b></p> <ol style="list-style-type: none"> <li>1. If testing is required, Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of particulate matter emissions.</li> <li>2. If testing is required, Method 9 of 40 CFR Part 60, Appendix A shall be used in the determination of opacity of the stack emissions.</li> <li>3. If testing is required, Method 7E of 40 CFR Part 60, Appendix A shall be used in the determination of NO<sub>x</sub> emissions.</li> </ol>	<p>Rule 335-3-1-.05</p> <p>Rule 335-3-1-.05</p> <p>Rule 335-3-1-.05</p>

	<b>Regulations</b>
4. If testing is required, Method 10 of 40 CFR Part 60, Appendix A shall be used in the determination of CO emissions.	Rule 335-3-1-.05
5. If testing is required, Methods 18, 25, 25A, or 25B of 40 CFR Part 60, Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
<b>Emission Monitoring</b>	
1. The facility shall install a non-resettable hour meter on the engine if one is not already installed.	Rule 335-3-16-.03
2. The facility must operate and maintain the engine according to the manufacturer's emission-related written instructions.	Rule 335-3-16-.03
3. The facility must install and configure the engine according to the manufacturer's emission-related specification.	Rule 335-3-16-.03
4. For the emergency engine, to retain its emergency status the following must be maintained:	Rule 335-3-16-.03
(a) The engine may be operated for the purpose of maintenance checks and readiness testing for a period not to exceed 100 hours per year	
(b) There is no time limit on the use of the engine in emergency situations.	
(c) The engine may operate up to 50 hours per year in non-emergency situations.	
i. The 50 hours for non-emergency situations shall count towards the 100 hours allowed for maintenance checks and readiness.	
ii. The 50 hours for non-emergency situations shall not be used for peak shaving or generating income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	
iii. Any operation of the emergency engine other than for emergency operation, maintenance testing, and operation in non-emergency situation for 50 hours per year is prohibited.	
<b>Recordkeeping and Reporting Requirements</b>	
4. The facility shall maintain a record of the hours of operation of the engine that is recorded through the non-resettable hour meter. The facility must document how many hours are spent for emergency operation and non-emergency operation, including the reason the engine was in operation during that time.	Rule 335-3-16-.03