

AIR PERMIT

PERMITEE: VULCAFLEX, INC.

LOCATION: AUBURN, ALABAMA

PERMIT NUMBER

206-0055-X001

DESCRIPTION OF SOURCE

COATING, LACQUERING, AND
EMBOSSING LINE WITH
REGENERATIVE THERMAL
OXIDIZER (RTO) CONTROL DEVICE

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: XXXXXX, 2026

Alabama Department of Environmental Management

VULCAFLEX, INC.
AUBURN, ALABAMA
(PERMIT NO. 206-0055-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. Submission 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.
5. 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.
6. Nothing in this permit or conditions thereto shall negate any authority granted to the Department pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
7. 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.
8. Within 10 days of the end of each month, compliance with all provisos in this permit will be determined. These records shall be maintained for 2 years at the facility. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.
9. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stock piles, screens, dryers, hoppers, ductwork, etc.
10. Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne:

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- (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; or
 - (E) by any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.
11. 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.
12. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
13. 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.
14. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
15. Emission of Volatile Organic Compounds (VOCs) from all surface coating operations from the entire facility including, but not limited to coating, storage, cleanup, etc., shall not exceed 104.70 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted. If this amount is exceeded, then the facility must comply with the applicable parts of 40 CFR Part 60, Subpart VVV, Standards of Performance for Polymeric Coating of Supporting Substrates. Otherwise, the facility must comply with the requirements of Part 60.744(b), 60.747(b), and 60.747(c).

If the emission of VOCs exceed these limits, the Air Division shall be notified in writing within 10 days of the identification of the exceedance. Accurate and understandable records of consumption, which records at least the last two years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to its air permit. These records shall contain the following information:

- (A) The type, quantity in gallons, and weight in lbs, of each VOC and HAP containing materials used each calendar month.
- (B) The VOC content by weight (in pounds per gallon) of each VOC containing materials used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or equivalent vendor data approved by the Department in advance. The HAP content by weight (in pounds per gallon) of each HAP containing materials used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or equivalent vendor data approved by the Department in advance. The VOC/HAPs content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.
- (C) The percent by volume and percent by weight of VOCs, VHAPs, solids, water, and exempt VOC compounds content of each VOC and HAPs containing materials used each calendar month.
- (D) Complete inventories of VOC/HAPs containing materials (their usage and VOC and/or HAPs content) shall be made at the end of each calendar month. Compliance with VOC/HAPs limits shall be based upon these monthly materials use inventories. Emissions may be adjusted for VOC/HAPs content of material removed from the plant as waste or returns if the record-keeping and details surrounding the materials are approved in advance.
- (E) The amount of VOCs and HAPs emitted each calendar month expressed in the units of pounds and tons.
- (F) The rolling 12-month total of VOCs and HAPs emitted in the units of pounds and tons.

A monthly report summarizing the above information shall be completed monthly. The monthly reports shall be submitted at least quarterly by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

16. The emission of Volatile Organic Compounds (VOCs) from all lacquering line operations from the entire facility including, but not limited to lacquering, storage, cleanup, etc., shall be subject to and must comply with the applicable parts of 40 CFR Part 60, Subpart FFF, Standards of Performance for Flexible Vinyl and Urethane Coating and Printing. The facility must comply with the requirements of Part 60.582(a)(1) or (2), 60.584(b), and 60.585(b).

Accurate and understandable records of consumption, which records at least the last two years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to its air permit. These records shall contain the following information:

- (A) The type, quantity in gallons, and weight in lbs, of each VOC and HAP containing materials used each calendar month.
- (B) The VOC content by weight (in pounds per gallon) of each VOC containing materials used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or equivalent vendor data approved by the Department in advance. The HAP content by weight (in pounds per gallon) of each HAP containing materials used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or equivalent vendor data approved by the Department in advance. The VOC/HAPs content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.
- (C) The percent by volume and percent by weight of VOCs, VHAPs, solids, water, and exempt VOC compounds content of each VOC and HAPs containing materials used each calendar month.
- (D) Complete inventories of VOC/HAPs containing materials (their usage and VOC and/or HAPs content) shall be made at the end of each calendar month. Compliance with VOC/HAPs limits shall be based upon these monthly materials use inventories and the use and control efficiency of the RTO. Emissions may be adjusted for VOC/HAPs content of material removed from the plant as waste or returns if the record-keeping and details surrounding the materials are approved in advance. Emissions calculations and records will also incorporate the use and control efficiency of the RTO.
- (E) The amount of VOCs and HAPs emitted each calendar month expressed in the units of pounds and tons.
- (F) The rolling 12-month total of VOCs and HAPs emitted in the units of pounds and tons.

A monthly report summarizing the above information shall be completed monthly. The monthly reports shall be submitted at least quarterly by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

17. This facility shall not emit any pollutant in excess of the major source thresholds as defined in ADEM Administrative Code R. 335-3-16-.01. If any emission rate exceeds this threshold, then ADEM shall be notified in writing within 10 days of the exceedance.
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. Each point of emission 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.
20. All the original data charts, performance evaluations, calibration checks, adjustment and maintenance records and other information regarding monitoring system(s) will be maintained in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports and records.
21. This source shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by six (6) minute average. During one six (6) minute period in any sixty (60) minute period, this unit may discharge opacity not exceeding forty percent (40%).
22. In case of the shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least 24 hours prior to the planned shutdown, unless accompanied by the immediate shutdown of the emission source.
23. 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 one (1) hour, unless accompanied by the immediate shutdown of the emission source, the person responsible for such equipment shall notify the Department within an additional 24 hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

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24. The Department must be notified in writing at least 30 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 Department within 15 days of the actual completion of the test, unless an extension of time is specifically approved by the Department.

25. 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.

26. The minimum operational temperature of the combustion chamber of the thermal oxidizer for the process equipment shall be determined by test. Following testing, the temperature corresponding to an acceptable VOC destruction efficiency shall be established as the minimum operational temperature of the combustion chamber. The temperature data must be instantaneously recorded on a chart or other permanent record form which shows continuous temperature readings of the combustion chamber temperature. The record must be maintained for at least two years following the data recording.
27. The thermal oxidizer must have an audible alarm or easily detectable signal that will provide a warning when the combustion chamber temperature decreases to less than the established minimum operational temperature. The origin and detectability of the audible or other signal shall be such that it can be readily heard or detected by the operator or another person who will immediately determine the cause and take appropriate action to correct any problem and/or record the malfunction/reason. The time, duration, cause(s), and the action(s) taken for any operating temperature less than the established minimum shall be recorded in a form suitable for inspection. These records shall be maintained for at least two years. For periods when the temperature is more than 50 °F below the minimum operating temperature, VOCs will be calculated as if there was no (0%) capture and destruction of VOCs in the thermal oxidizer.
28. When any bypassing of the thermal oxidizer occurs, the time, date, or duration, estimated VOC emissions, and equipment process(es) bypassed will be recorded.
29. Records will be maintained of any malfunction or non-operation of the thermal oxidizer, which results in an increase in the VOC emissions from any or all process equipment. These records will be maintained in a form suitable for inspection for a period of two years.
30. Display of Air Permit – A person who has been granted an Air permit for any article, machine, equipment, or other contrivance shall keep such permit under file or on display at all times at the site where the article, machine, equipment, or other contrivance is located and will make such a permit readily available for inspection by any and all persons who may request to see it.
31. This permit expires and the application is canceled if construction has not begun within 24 months of the date of issuance of the permit.

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32. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Department within 15 working days of completion of testing.

Particulates	☐	Carbon Monoxide	☐
Sulfur Dioxide	☐	Nitrogen Oxides	☐
Volatile Organic Compounds	☒	Visible Emissions	☐

33. A report summarizing the following information shall be submitted for each month by the 15th day of the month following the end of the quarter. The report shall provide the following information, as applicable.

- (A) The quantity of the solvents of VOCs in the lacquering process applied.
- (B) The VOCs bypassed.
- (C) The VOCs vented to the thermal oxidizer by the process operation.
- (D) The estimated average destruction efficiency of the thermal oxidizer.
- (E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer.
- (F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer is more than 50 °F below the average temperature recorded during the most recent performance test which complied with the required overall VOC emission reduction.
- (G) The cumulative or total quantity of VOCs released or exhausted into the atmosphere by the laquering lines and their oxidizer control unit during the applicable month and previous eleven months.
- (H) Records of malfunction(s) of the thermal oxidizer, to include the time and date of the malfunction, the time and date of the startup of the thermal oxidizer upon repair, and the total amount of VOCs and HAPs applied and emitted during the malfunction period.

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34. Emissions tests to demonstrate removal and destruction efficiency for the thermal using the EPA Protocol specified in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25 or 25A as required by the Department are to be conducted for VOCs at intervals not to exceed 5 years (unless another timeframe is specified by the Department) following the date of initial compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25 or 25A as required by the Department.

xxxxxxx, 2026
DATE



AIR PERMIT

PERMITTEE: VULCAFLEX, INC.

FACILITY NAME:

LOCATION: AUBURN, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
206-0055-X002	297 KW DIESEL FIRED EMERGENCY GENERATOR

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: XXXXXXXX, 2026

Alabama Department of Environmental Management

VULCAFLEX, INC.
AUBURN, ALABAMA
(PERMIT NO. 206-0055-X002)
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. 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.
5. 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.
6. Nothing in this permit or conditions thereto shall negate any authority granted to the Department pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
7. 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.
8. Within 10 days of the end of each month, compliance with all provisos in this permit will be determined. These records shall be maintained for 5 years at the facility. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within thirty (30) days of the identification of the exceedance.
9. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stock piles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds shall be maintained in a 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.

- 10. 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.
- 11. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
- 12. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
- 13. Display of Air Permit – A person who has been granted an Air permit for any article, machine, equipment, or other contrivance shall keep such permit under file or on display at all times at the site where the article, machine, equipment, or other contrivance is located and will make such a permit readily available for inspection by any and all persons who may request to see it.

14. This engine must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. This engine must install a non-resettable hour meter prior to startup of the engine. The emergency generator will be operated and maintained in compliance with the manufacturer's emission-related written instructions and records will be kept of conducted maintenance. The facility will limit operating hours for maintenance checks and readiness testing to 100 hours per year. Records of the above requirements must be kept in a permanent form suitable for inspection. The records shall be retained for at least two years from the date of generation and available upon request.
15. The emergency generator is subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, Subpart ZZZZ.
16. This source shall not exhibit greater than 20% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per ADEM Administrative Code 335-3-4-.01(1)
17. The facility must comply with the following requirements in Table:

Table 3 to Appendix I—Tier 3 Emission Standards
[g/kW-hr] Part 1039

Rated (kW)	power	Starting model year	NO_x+NMHC	CO	PM
130 ≤ kW ≤ 560		2006	4.0	3.5	0.20

18. This permit expires and the application is canceled if construction has not begun within 24 months of the date of issuance of the permit.
19. On completion of construction of the device for which this permit is issued, notification of the fact is to be given to the Chief of the Air Division. Authorization to operate the unit must be received from the Chief of the Air Division. Failure to notify the Chief of the Air Division of construction and/or operation without authorization could result in revocation of this permit.

xxxxxxx 2026
DATE