Statement of Basis
Alfab, Inc.
602-0019

Introduction

On August 11, 2026, Alfab, Inc, (Alfab), applied for renewal of Major Source Operating Permit (MSOP) No. 602-0019. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Administrative Code R. 335-3-16. Alfab 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 third renewal of Alfab's Title V MSOP. The original Title V was issued on October 15, 2012. The current MSOP expires on October 14, 2027.

Air Permits for Unit Nos. 001, 002, and 003 were originally issued on October 8, 2009. These Air Permits were incorporated into the initial Title V Permit on October 15, 2012. A modification of the Air Permit for Unit No. 003 was issued on June 6, 2013. This Air Permit was incorporated into the initial Title V Permit on October 15, 2017. A modification of the Air Permit for Unit No. 001 was issued on February 24, 2020. A modification of the Air Permit for Unit No. 003 was issued on March 16, 2020. These Air Permits were incorporated into the Title V Permit on October 15, 2022.

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

There are no current or ongoing enforcement actions against this facility 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 AL0000000103100019).

This facility conducts the manufacture of miscellaneous metal parts (SIC #3441-3449). 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 this facility's last Title V application, 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	**Mat Line No. 1**
002	**Stair/Miscellaneous Line No. 2**
003	**Rotoblast Operation(s) with Baghouse(s)**

Operations Mat Line No. 1

This line contains a paint booth and flash-off oven. The blasted materials are attached to a monorail and moved to the paint booth to receive a primer coat. The materials are then moved to the flash-off oven and placed in a holding area until dry. Next, the materials go through the paint booth again to receive a non-skid coating, after which the materials pass through the flash-off oven again and are placed in the holding area to dry for a minimum of twelve hours. This line typically operates for ten hours a day four days a week. Emissions from the paint booth are sent through a solid filter.

Emissions

VOCs are the expected pollutants to be emitted from this process. The facility wide potential emissions of VOCs are 235 TPY.

Applicable Regulations

Title V:

The regulated criteria air contaminants emitted into the atmosphere by the manufacturing of the miscellaneous metal parts are VOCs, which come from the organic solvents in the coatings. The potential emissions of VOCs exceed the threshold of 100 tons per year; therefore, Alfab 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:
Alfab's current permits limit their VOC emissions to restrict their potential emissions of criteria pollutants to below major source thresholds for PSD purposes. Alfab 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 Permits X001 and X002 issued on October 8, 2009, which were subsequently incorporated into the Title V issued on October 15, 2012.

There are no 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.

Stair Line/Miscellaneous
Stairs, handrails, and platforms are prepped by wiping and brushing. Small items are then hung on a monorail to be painted. Large items are painted and placed in the yard to dry. No items in this line go through assisted drying. Emissions from the paint booth are sent through a solid filter.

Emissions
VOCs are the expected pollutants to be emitted from this process. The facility wide potential emissions of VOCs are 235 TPY.

Applicable Regulations
Title V:
The regulated criteria air contaminants emitted into the atmosphere by the manufacturing of the miscellaneous metal parts are VOCs, which come from the organic solvents in the coatings. The potential emissions of VOCs exceed the threshold of 100 tons per year; therefore, Alfab 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:
Alfab's current permits limit their VOC emissions to restrict their potential emissions of criteria pollutants to below major source thresholds for PSD purposes. Alfab 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 Permits X001 and X002 issued on October 8, 2009, which were subsequently incorporated into the Title V issued on October 15, 2012.

There are no 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
Alfab will maintain records of monthly coating 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.

Roto Blast Nos. 2 and 3
Alfab has two shot blast machines for the same purpose of prepping aluminum materials to be painted. These shot blasts are typically run for seven hours two days a week.

Emissions from each shot blast machine are sent to a baghouse for particulate control.

Emissions
Particulates are the expected pollutants to be emitted from this process. These units are expected to meet the state process weight limit.

Applicable Regulations
State Process Weight Regulations
Alfab has submitted documentation that the shotblast operations with baghouse control devices meet this regulation.

Testing of Emissions
There is no required testing of emission sources.

Monitoring of Emissions
Alfab will maintain records of shotblast material usage. These records will be submitted to the Department annually. Alfab will maintain manometers on each baghouse to measure pressure drop. These manometers will be observed weekly for proper operation, and the results are recorded in a logbook. Corrective measures will be taken whenever excess readings or visible emissions are observed.

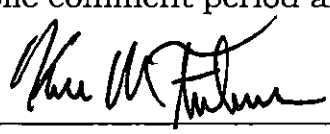
The monitoring for the production process is the same as in the existing Title V Permit. This monitoring has been shown to be sufficient in the past and, therefore, no change to the monitoring is needed.

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 Alfab following a public comment period and EPA review.



Kevin Fulmer
Chemical Branch
October 2026