## JEFFERSON COUNTY DEPARTMENT OF HEALTH

## AIR POLLUTION PROGRAM

### TITLE V OPERATING PERMIT

Permittee:

Vulcan Pipe & Steel Coatings, Inc.

Location:

2410 Woodward Road

Bessemer, Alabama 35020

Permit No:

4-07-0423-05

Issuance Date:

January 23, 2018

Expiration Date:

January 22, 2023

Nature of Business:

Surface Coating of Miscellaneous Metal Parts & Products

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	Emissions Unit No.	Emissions Unit Description	
100	001	Facility-Wide Operations: Surface Coating of Miscellaneous Metal Parts & Products Subject to 40	
j	VVI	CFR 63; Subpart MMMM	100
7	008	Abrasive Blasting Operations	
3			
į.	009	Powder Coating Operations	ŕ

This Permit is issued pursuant to and is conditioned upon the compliance with the provisions of the Jefferson County Board of Health Air Pollution Control Rules and Regulations, the applicable requirements of the Clean Air Act implementation plan for Alabama approved or promulgated by the United States Environmental Protection Agency (EPA) through rulemaking under title I of the Clean Air Act (identified in 40 CFR 52, Subpart B) and other applicable requirements as defined in section 18.1.1(e) of the Jefferson County Board of Health Rules and Regulations, Section 18 of the Alabama Air Pollution Control Act of 1971, Act No. 769 (Regular Session, 1971), Section 22-28-16 of the Alabama Air Pollution Control Act as amended, Orders of the Jefferson County Board of Health, Orders of the Director of the Alabama Department of Environmental Management (ADEM), and any applicable local, state or federal Court Order. This Permit is subject to the accuracy of all information submitted relating to the permit application and to the conditions appended hereto. It is valid from the date of issuance until the expiration date and shall be posted or kept underfile at the source location described above and shall be made readily available for inspection at any reasonable time to any and all persons who may request to see it. This Permit is not transferable.

Pursuant to the Clean Air Act, conditions of this permit are federally enforceable by EPA, The Jefferson County Board of Health, ADEM and citizens in general. However, provisions that are not required by the Clean Air Act or under any of its applicable requirements, are considered to be Jefferson County provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate Sections of this Operating Permit and are specifically identified as not being federally enforceable.

Jonathan Stanton, Director Environmental Health Services

Approved:

Mark Wilson, M.D.

Health Officer



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In addition to compliance with Alabama Air Pollution Control Act Number 769 (Regular Session, 1971) and Act Number 612 (Regular Session, 1982) and with all applicable Air Pollution Control Rules and Regulations, the conditions which are listed below are hereby contained in and made a part of this permit. For each citation to a Jefferson County Board of Health regulation provided in connection with a permit condition (other than for those permit conditions that are specifically identified in the permit as not being federally enforceable), Appendix A to this permit identifies the corresponding ADEM regulation that has been approved by EPA as part of the Clean Air Act implementation plan for Alabama (identified in 40 CFR 52, Subpart B). The corresponding ADEM regulations, together with the cited Jefferson County Board of Health regulations, serve as the origin and authority for the associated permit term or condition.

### **GENERAL PERMIT CONDITIONS**

No.	Federally Enforceable General Permit Conditions	Regulations
1.	Definitions For the purposes of this Major Source Operating Permit, the following terms will have the meanings ascribed to in this permit:	1.3 8.11 63.3981
	"12-Month Rolling Average" means a method of determination of compliance with an emission limit calculated after the end of each month as the average of the monthly emission rates for the 12 most recent completed months.	
	"12-Month Rolling Total" means a method of determination of compliance with an annual limit calculated after the end of each month as the sum of the monthly emissions for the 12 most recent completed months.	
	"40 CFR 51" is an acronym for Part 51 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 52" is an acronym for Part 52 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 59" is an acronym for Part 59 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 60" is an acronym for Part 60 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 61" is an acronym for Part 61 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 63" is an acronym for Part 63 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 68" is an acronym for Part 68 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 82" is an acronym for Part 82 of Title 40 of the Code of Federal Regulations.	
	"40 CFR 98" is an acronym for Part 98 of Title 40 of the Code of Federal Regulations.	
	"Act" means the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.	
	"ADEM" means the Alabama Department of Environmental Management.	
	"Additive" means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).	
	"Add-on control" means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.	
	"Adhesive, adhesive coating" means any chemical substance that is applied for the purpose of bonding two surfaces together. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this Subpart MMMM.	
	"Capture device" means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.	

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	"Capture efficiency or capture system efficiency" means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.	
	"Capture system" means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings and cleaning materials occur, such as flashoff, drying, or curing. As used in 40 CFR 63, Subpart MMMM, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.	
	"Carbon dioxide equivalent or CO <sub>2</sub> e" means the number of metric tons of CO <sub>2</sub> emissions with the same global warming potential as one metric ton of another greenhouse gas, and is calculated using Equation A-1 of 40 CFR 98.	
	"Cleaning material" means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g., depainting or paint stripping), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.	
	"CO" is an acronym for carbon monoxide.	
	"Coating" means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of 40 CFR 63, Subpart MMMM. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).	
	"Coating operation" means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a given quantity of coating or cleaning material is applied to a given part and all subsequent points in the affected source where organic HAP are emitted from the specific quantity of coating or cleaning material on the specific part. There may be multiple coating operations in an affected source. Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens is not a coating operation for the purposes of 40 CFR 63, Subpart MMMM.	
	"Coatings solids" means the nonvolatile portion of the coating that makes up the dry film.	
	"Continuous parameter monitoring system (CPMS") means the total equipment that may be required to meet the data acquisition and availability requirements of 40 CFR 63, Subpart MMMM, used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.	
	"Controlled coating operation" means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.	
	"Department" means the Jefferson County Department of Health.	
	"Deviation" means any instance in which the permittee fails to meet any requirement or obligation established by regulation, including but not limited to any emission limitation,	

No.	Federally Enforceable General Permit Conditions	Regulations
	operating limit, work practice standard, or any permit term or condition, or fails to meet any term or condition adopted to implement an applicable requirement, including but not limited to emission limitations during periods of startup, shutdown or malfunction. A deviation is not always a violation. The determination of whether a deviation is a violation is at the discretion of the enforcement authority. For purposes of Subpart MMMM, deviation means any time the permittee:	-
	<ol> <li>Fails to meet any requirement or obligation established by Subpart MMMM including but not limited to, any emission limit or operating limit or work practice standard;</li> </ol>	
	<ol> <li>Fails to meet any term or condition that is adopted to implement an applicable requirement in Subpart MMMM and that is included in the operating permit for any affected source required to obtain such a permit; or</li> </ol>	
	<ol> <li>Fails to meet any emission limit, or operating limit, or work practice standard in Subpart MMMM during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by Subpart MMMM.</li> </ol>	
	"Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God. These are situations that require immediate corrective actions(s) to restore normal operation, and that cause the facility to exceed a technology based emission limitation set by the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.	
_	"Emissions unit" means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under §112(b) of the Act.	
	"Emission limitation" means the aggregate of all requirements associated with a compliance option including emission limit, operating limit, work practice standard, etc.	· ·
	"Enclosure" means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.	
	"EPA" means the U.S. Environmental Protection Agency.	
	"Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.	
	"Exempt compound" means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).	
	"Extreme performance fluoropolymer coating" means coatings that are formulated systems based on fluoropolymer resins which often contain bonding matrix polymers dissolved in non-aqueous solvents as well as other ingredients. Extreme performance fluoropolymer coatings are typically used when one or more critical performance criteria are required including, but not limited to a nonstick low-energy surface, dry film lubrication, high resistance to chemical attack, extremely wide operating temperature, high electrical insulating properties, or that the surface comply with government (e.g., USDA, FDA) or third party specifications for health, safety, reliability, or performance.	

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	curing process that typically requires high temperatures, a chemical reaction, or other specialized technology.	_
	"Facility maintenance" means the routine repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.	
	"Flash-off Area" shall mean the portion of a surface coating operation between the coating application area and the bake oven.	
	"Fugitive emissions" means those emissions from a stationary source that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.	
	"General use coating" means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in this section.	
	"GHG" is an acronym for greenhouse gas.	
	"HAP" is an acronym for Hazardous Air Pollutant.	
	"Hazardous Air Pollutant" means any of the substances listed in Appendix D of the Rules and Regulations.	
	"High performance architectural coating" means any coating applied to architectural subsections which is required to meet the specifications of Architectural Aluminum Manufacturer's Association's publication number AAMA 605.2-2000.	
	"High performance coating" means any coating that meets the definition of high performance architectural coating or high temperature coating in this section.	
	"High temperature coating" means any coating applied to a substrate which during normal use must withstand temperatures of at least 538 degrees Celsius (1000 degrees Fahrenheit).	
	"Magnet wire coatings," commonly referred to as magnet wire enamels, are applied to a continuous strand of wire which will be used to make turns (windings) in electrical devices such as coils, transformers, or motors. Magnet wire coatings provide high dielectric strength and turn-to-turn conductor insulation. This allows the turns of an electrical device to be placed in close proximity to one another which leads to increased coil effectiveness and electrical efficiency.	
	"Magnet wire coating machine" means equipment which applies and cures magnet wire coatings.	
	"Malfunction" means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.	
	"Manufacturer's formulation data" means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in §63.3941. Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.	
	"Mass fraction of organic HAP" means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as kg of organic HAP per kg of material.	

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	"Month" means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.	
	"NAAQS" is an acronym for "National Ambient Air Quality Standards."	
	"NESHAP" is an acronym for "National Emission Standards for Hazardous Air Pollutants."	
	"New Source Review" (NSR) permitting means a system of evaluating the impact of any significant modification made at a major source and establishing permitting conditions to prevent the modification from causing or contributing to a violation of the NAAQS or consuming more than the allowed increment. These permitting provisions are located in Parts 2.4 and 2.5 of the Rules and Regulations.	
	"Non-HAP coating" means, for the purposes of 40 CFR 63, Subpart MMMM, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.	
	"NO <sub>X</sub> " is an acronym for nitrogen oxides.	
	"NSPS" is any acronym for "New Source Performance Standards."	•
	"Organic HAP content" means the mass of organic HAP emitted per volume of coating solids used for a coating calculated using Equation 2 of §63.3941. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, organic HAP content is the mass of organic HAP that is emitted, rather than the organic HAP content of the coating as it is received.	
	"Permanent total enclosure (PTE)" means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.	
	"Permittee" means the holder of an operating permit issued by the Department.	
	"Performance audit" means a procedure to analyze blind samples, the content of which is known by the Administrator, simultaneously with the analysis of performance test samples in order to provide a measure of test data quality.	
	"Performance test" means the collection of data resulting from the execution of a test method (usually three emission test runs) used to demonstrate compliance with a relevant emission standard as specified in the performance test section of the relevant standard.	
	"PM <sub>10</sub> " is an acronym for particulate matter of less than 10 microns.	
	"PM <sub>2.5</sub> " is an acronym for particulate matter of less than 2.5 microns.	
	"Pollution prevention" means source reduction as defined under the Pollution Prevention Act of 1990 (e.g., equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control), and other practices that reduce or eliminate the creation of pollutants through increased efficiency in the use of raw materials, energy, water, or other resources, or protection of natural resources by conservation.	
	"Protective oil" means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils. Protective oils used on	

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	miscellaneous metal parts and products include magnet wire lubricants and soft temporary protective coatings that are removed prior to installation or further assembly of a part or component.	
	"PSD" is an acronym for "Prevention of Significant Deterioration" permitting under Chapter 2.4 of the Rules and Regulations.	
	"Reactive adhesive" means adhesive systems composed, in part, of volatile monomers that react during the adhesive curing reaction, and, as a result, do not evolve from the film during use. These volatile components instead become integral parts of the adhesive through chemical reaction. At least 70 percent of the liquid components of the system, excluding water, react during the process.	
	"Responsible official" means a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and the delegation of authority to such representatives is approved in advance by the Department.	
	"RICE" is an acronym for reciprocating internal combustion engine.	
	"Rubber-to-metal coatings" are coatings that contain heat-activated polymer systems in either solvent or water that, when applied to metal substrates, dry to a non-tacky surface and react chemically with the rubber and metal during a vulcanization process.	
	"Rules and Regulations" means the Jefferson County Board of Health Air Pollution Control Rules and Regulations.	:
	"SIP" is an acronym for "State Implementation Plan" pursuant to 40 CFR 52.	
	"SO <sub>2</sub> " is an acronym for sulfur dioxide.	
	"Source" means any building, structure, facility, installation, article, machine, equipment, device, or other contrivance which emits or may emit any air contaminant. Any activity which utilizes abrasives or chemicals for cleaning or any other purpose (such as cleaning the exterior of buildings) which emits air contaminants shall be considered a source.	
	"Spray Application" shall mean a method of applying coatings by atomizing and directing the atomized spray toward the part to be coated.	
	"Stationary Source" means any building, structure, facility or installation that emits or may emit any regulated pollutant as defined in Part 18.1 of the Rules and Regulations or any pollutant listed in Appendix D of the Rules and Regulations.	
	"Startup, initial" means the first time equipment is brought online in a facility.	
	"Surface preparation" means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called depainting.	
	"Temporary total enclosure" means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.	
	"Thinner" means an organic solvent that is added to a coating after the coating is received from the supplier.	
	"Total volatile hydrocarbon (TVH)" means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of	

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	appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.	
	"Transfer Efficiency" shall mean the ratio of the amount of coating solids deposited onto the surface of a part or product to the total amount of coating solids used.	
	"TSP" is an acronym for total suspended particulate matter.	
	"Uncontrolled coating operation" means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.	
	"VOC" is an acronym for volatile organic compound.	
	"Volatile Organic Compound" means any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. This includes any such organic compound other than those listed under Part 1.3 of the Rules and Regulations and/or under 40 CFR §51.100(s)(1).	
	"Volume fraction of coating solids" means the ratio of the volume of coating solids (also known as the volume of nonvolatiles) to the volume of a coating in which it is contained; liters (gal) of coating solids per liter (gal) of coating.	
	General Conditions	
2.	Basis for Permit This Operating Permit is issued based on provisions contained in all existing Jefferson County Board of Health Air Pollution Control Rules and Regulations (hereinafter called Rules and Regulations in this permit). In the event amendments, revisions or additions are made to these Rules and Regulations, it shall be the responsibility of the permit holder (hereinafter called the permittee in this permit) to comply with such new Rules and Regulations. Additions and revisions to the conditions in this Operating Permit will be made by the Jefferson County Department of Health (hereinafter called the Department), if necessary, to assure that the Rules and Regulations are not violated.	AL Act 769
3.	Authority Nothing in this Operating Permit or conditions appended thereto shall negate any authority granted to this Department or the Health Officer pursuant to Alabama Air Pollution Control Act No. 769 (Regular Session, 1971) and Act No. 612 (Regular Session, 1982) or any regulations promulgated thereunder.	AL Act 769
4.	Acceptance of Permit The permittee is required to bring the operation of a source within the standards of Paragraph 18.2.8(a) of the Rules and Regulations. Commencing construction or operation of the source shall be deemed acceptance of all conditions specified. A Title V Operating Permit with revised conditions may be issued upon receipt of a new application if the permittee demonstrates that the source can operate within the standard of Paragraph 18.2.8(a) of the Rules and Regulations under the revised conditions. This Title V permit supersedes all permits previously issued by the Department to this facility. The permittee shall return the expired permit(s) to the Department within 30 days after this permit is issued.	18.2.4
5.	Compliance With Existing and Future Regulations  A. The permittee shall comply with all conditions of the Rules and Regulations.  B. The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.  C. The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit, and shall follow any more detailed schedule of compliance set forth in the applicable requirement or unit specific permit requirements.	18.5.6 18.4.8(h) 18.7.3 18.7.6

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	D. The permittee shall notify the Department in writing within 2 working days of becoming subject to a federal MACT standard pursuant to Section 112 of the Act.	
6.	Noncompliance Noncompliance with a permit will constitute a violation of the Act and the Rules and Regulations and may result in enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.	18.5.6
7.	Compliance Defense The permittee shall not use as a defense in an enforcement action, that maintaining compliance with permit conditions would have required halting or reducing the permitted activity.	18.5.7
8.	Credible Evidence Any credible evidence or information relevant to whether a source may have been in compliance with applicable requirements can be used to establish whether or a not an owner or operator has violated or is in violation of any rule or standard in the Rules and Regulations and/or any applicable provisions of 40 CFR 60.	1.18 60.11(g)
9.	Circumvention  No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminants which would otherwise violate the Rules and Regulations.	1.15 40 CFR 60.12 40 CFR 63.4(b)
10.	Bypass Prohibited  Except as otherwise provided in this permit, the permittee shall not bypass, without prior approval from this Department, any air pollution control device. The permittee shall not shut down any air pollution control device unless such shutdown is accompanied by the corresponding shutdown of the respective source which the device is intended to control.	18.2.4
11.	Shutdown of Control Equipment In the case of shutdown of air pollution control equipment for scheduled maintenance, the intent shall be reported to this Department at least 24 hours prior to the planned shutdown unless the scheduled shutdown is accompanied with the shutdown of the source being controlled. The report shall contain the information listed in Section 1.12.1.	1.12.1
12.	<ul> <li>Maintenance of Controls</li> <li>A. The permittee shall equip each fabric filter particulate matter control device with a pressure differential measuring device to measure the pressure drop across the filter media in the control device. The device shall be installed in a location which is easily accessible for inspection by Department personnel.</li> <li>B. All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in accordance with the manufacturer's specifications or alternative procedures approved by the Department 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 emissions of air contaminants shall be maintained near the source and provided to the Department upon request.</li> <li>C. The permittee shall conduct routine inspections on all required control equipment. All inspection results and repair work performed on the pollution control device shall be recorded. These records shall be kept in a permanent form suitable for inspection.</li> </ul>	18.2.4 18.5.3(a)(2)
13.	<ul> <li>Nothing in this Operating Permit shall alter or affect the following:</li> <li>A. The provisions of §303 of the Act (emergency orders), including the authority of the Administrator under that section;</li> <li>B. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;</li> <li>C. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or</li> <li>D. The ability of EPA to obtain information from a source pursuant to §114 of the Act.</li> </ul>	18.10.3

No.	Federally Enforceable General Permit Conditions	Regulations
14.	Additional Information The permittee shall submit any additional information to the Department to supplement or correct an application promptly after becoming aware of the need for additional or corrected information. Also, the permittee shall submit additional information concerning any new requirements which have become applicable after a complete application has been filed but before a draft permit is released. Any change in the information already provided pursuant to 40 CFR 63 shall be provided in writing within 15 calendar days	18.4.7 63.9(j)
15.	after the change.  Display and Availability of Permit  The permittee shall keep this Operating Permit under file or on display at all times at the site where the source is located and shall make the permit available for inspection by any and all persons who may request to see it.	18.2.2
16.	Payment of Fees  The permittee must have paid all fees required by the Rules and Regulations or the Operating Permit is not valid. Payment of operating permit fees required under Chapter 16 of the Rules and Regulations shall be made on or before the date specified under Section 16.5.1 of the Rules and Regulations of each year. Failure to make payment of fees within 30 days of the specified date shall cause the assessment of a late fee of 3% (of the original fee) per month or fraction thereof.	18.5.11 Chapter 16 16.5
17.	Transfer  This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another or from one person to another except as provided in Subparagraph 18.13.1(a)(5) of the Rules and Regulations.	18.2.6
18.	New Air Pollution Sources and Changes to Existing Units  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.	1.5.15 63.9(j)
19.	Construction Not In Accordance with Applications  If the source permitted herein has not been constructed in accordance with the Operating Permit application and if the changes noted are of a substantial nature in that the amount of air contaminants emitted by the source may be increased or in that the effect is unknown, then the Operating Permit shall be revoked. No further application for an Operating Permit shall be accepted until the source has been reconstructed in accordance with the Operating Permit or until the permittee has proven to the Department that the change will not cause an increase in the emission of air contaminants.	18.2.8(e)
20.	Expiration  A source's right to operate shall terminate upon the expiration of this Operating Permit unless a timely complete renewal application has been submitted at least 6 months, but not more than 18 months before the date of expiration or the Department has taken final action approving the source's application for renewal by the expiration date. The expiration date of this Operating Permit is printed on the first page of this permit.	18.4.3 18.5.2 18.12.2(b)
21.	<ul> <li>Revocation This Operating Permit may be revoked for any of the following reasons: A. Failure to comply with any conditions of the permit; B. Failure to establish and maintain such records, make such reports, install, use and maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as may be prescribed in accordance with Section 1.9.2 of the Rules and Regulations; C. Failure to comply with any provisions of any Department administrative order issued concerning the permitted facility; D. Failure to allow entry and inspections by properly identified Department personnel; E. Failure to comply with the Rules and Regulations; or </li> </ul>	18.2.9

No.	Federally Enforceable General Permit Conditions	Regulations
	F. For any other cause, after a hearing which establishes, in the judgment of the Department, that continuance of the permit is not consistent with the purpose of the Act or Rules and Regulations.	
22.	Severability In case of legal challenge to any portion of this Title V Operating Permit, the remainder of the permit conditions shall continue in force.	18.5.5
23.	<ul> <li>Reopening for Cause</li> <li>Under any of the following circumstances, this Operating Permit will be reopened and revised prior to the expiration of the permit:</li> <li>A. Additional applicable requirements under the Clean Air Act become applicable to the permittee with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirements. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</li> <li>B. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</li> <li>C. The Department, ADEM or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</li> <li>D. The Administrator, ADEM or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</li> </ul>	18.13.5
24.	Changes or Termination for Cause – No Stay of Permit Conditions  This permit may be modified, revoked, reopened and reissued or terminated for cause.  The filing of a request by the permittee for a permit modification, revocation and reissuance or termination, or of a notification of a planned change or anticipated noncompliance will not stay any permit condition.	18.5.8
25.	Requests for Information The permittee shall furnish to the Department within 30 days, or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by the permit.	18.5.10
26.	<ul> <li>Entry and Inspections</li> <li>The permittee shall allow the Department or authorized representative, upon presentation of credentials and other documents that may be required by law, to conduct the following:</li> <li>A. Enter upon the permittee's premises where a source is located or emissions related activity is conducted or where records are kept pursuant to the permit conditions;</li> <li>B. Review and/or copy at reasonable times any records kept pursuant to the permit conditions;</li> <li>C. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices or operations required by the permit; and</li> <li>D. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.</li> <li>Denial of access upon proper identification is grounds for permit revocation.</li> </ul>	1.8 18.7.2 18.2.9(d)

No.	Federally Enforceable General Permit Conditions	Regulations
27.	Flexibility Changes	18.13.2
	Certain changes (per §502 (b)(10) of the Act) can be made to this Operating Permit	
	without a revision if no modification as defined in the Rules and Regulations would occur	
	and the changes do not exceed the emissions allowed under this permit provided that	
	written notification is sent to the Department and EPA at least 7 days before the change is	
	made. The written notification shall describe the proposed change, the date of the change,	
	any change in emissions, and any term or condition of the permit which is no longer valid due to the change.	
28.	Minor Permit Modifications	18.13.3(a)(1)
20.	Minor permit modification procedures may be used only for those permit modifications	18.13.3
	that:	
	A. Do not violate any applicable requirement;	
	B. Do not involve significant changes to existing monitoring, reporting, or record	
	keeping requirements in the permit;	
	C. Do not require or change a case-by-case determination of an emission limitation or	
	other standard, or a source-specific determination for temporary sources of ambient	
	impacts, or a visibility or increment analysis;	
	D. Do not seek to establish or change a permit term or condition for which there is no	,
	corresponding underlying applicable requirement and that the source has assumed to	
	avoid an applicable requirement to which the source would otherwise be subject.	
	Such terms and conditions include:	
	<ol> <li>A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the Act; and</li> </ol>	
	2. An alternative emissions limit approved pursuant to regulations promulgated	
	under §112(i)(5) of the Act;	
	E. Are not modifications under any provision of title I of the Act; and	
	F. Are not required by Part 18.12 of this Chapter to be processed as a significant	
	modification.	
	An application requesting the use of minor permit modification procedures shall meet the	
	requirements of Section 18.4.8 relative to the modification and shall include the	
	information listed at Paragraph 18.3.3(b).	<b></b>
29.	Significant Modifications	18.13.4
	Modifications that are significant modifications under the new source review permitting	
	provisions of Part 2.4 (Prevention of Significant Deterioration) or Part 2.5	
	(Nonattainment Areas) regulations, are modifications under the NSPS or NESHAPS	
	regulations, or otherwise do not meet the requirements for minor permit modifications	
-	from Section 18.13.3 of the Rules and Regulations must be incorporated in the Operating Permit using the requirements for sources initially applying for an Operating Permit,	
	including those for applications, public participation, review by affected States, review by	
	ADEM, and review by EPA, as described in Parts 18.4 and 18.15 of the Rules and	
	Regulations.	
30.	Property Rights and Privileges	18.5.9
	No property rights of any sort or any exclusive privilege are conveyed through the	. = -= **
	issuance of this Operating Permit.	
31.	Alternative Operating Scenarios	18.5.13
	No alternative operating scenarios were identified by the permittee in its application.	
32.	Economic Incentives	18.5.12
	No permit revision shall be required under any approved economic incentives,	
;	marketable permit emissions trading and other similar programs or processes for changes	
	that are provided for in the Operating Permit.	
33.	Emission Reduction Plan	18.2.8(b)
	Upon notification by this Department, the permittee shall submit an Air Pollution	
	Emission Reduction Plan in a format approved by this Department concerning air	
	contaminant emissions reductions to be taken during declared air pollution episodes.	

No.	Federally Enforceable General Permit Conditions	Regulations
34.	Emergency Provision	18.11.2
	A. An "emergency" means any situation arising from sudden and reasonably	
	unforeseeable events beyond the control of the source, including acts of God, which	
	situation requires immediate corrective action to restore normal operation, and that	
	causes the source to exceed a technology-based emissions limitation under the	
	Operating Permit, due to unavoidable increases in emissions attributable to the	
	emergency. An emergency shall not include noncompliance to the extent caused by	
	improperly designed equipment, lack of preventative maintenance, careless or	
	improper operation, or operator error.	
	B. Exceedances of emission limits during emergencies (as defined above) at a facility	
	may be exempted from being violations provided that:	
	1. The permittee can identify the cause(s) of the emergency;	!
	2. At the time of the emergency, the permitted facility was being properly	
	operated;	
	3. During the period of the emergency the permittee took all reasonable steps to	
	minimize levels of emissions that exceeded the emission standards, or other	
	requirements in the permit;	
	4. The permittee submitted notice of the emergency to the Health Department	
	within 2 working days of the time when emission limitations were exceeded due	
	to the emergency, including those deviations attributable to upset conditions as	ļ
	defined in the permit, the probable cause of said deviations, and any corrective	
	actions or preventive measures that were taken;	
	5. The permittee submitted a written documentation of what was reported in the	
	notice of the emergency to the Department within 5 working days of the	
	emergency; and	
	6. The permittee immediately documented the emergency exceedance in an	
	"Emergency Log", which shall be maintained for 5 years in a form suitable for inspection upon request by a representative of the Department.	
	This provision is in addition to any emergency or upset provision contained in any	
35.	applicable requirement.	6.2.3
33.	Obnoxious Odors This Operating Permit is issued with the condition that, should obnoxious odors arising	0.2.3
	from the plant operations be verified by Department inspectors, measures to abate the	-
	odorous emissions shall be taken upon determination by this Department that these	
	measures are technically and economically feasible.	
36.	VOC Storage	8.3.1
50.	The permittee shall not store a VOC with a true vapor pressure ≥1.5 psia under actual	8.3.2(a)
	storage conditions in any storage vessel greater than 1,000 gallons unless the vessel is a	]
	pressure tank or is equipped with a permanent submerged fill or bottom fill pipe.	
37.	Title IV Requirements (Acid Rain Program)	18.5.1(b)
57.	Where an applicable requirement of the Rules and Regulations is more stringent than an	18.5.4
	applicable requirement of regulations promulgated under Title IV of the Act (the acid	
	rain program), both provisions shall be incorporated into the permit and shall be	
	enforceable by the Department. Emissions exceeding any allowances that the permittee	
	lawfully holds under title IV of the Act or the regulations promulgated thereunder are	
	prohibited. No permit revision shall be required for increases in emissions that are	
	authorized by allowances acquired pursuant to the acid rain program, provided that such	
	increases do not require a permit revision under any other applicable requirement. No	
	limit shall be placed on the number of allowances held by the permittee, however,	
	allowances may not be used as a defense to noncompliance with any other applicable	
:	requirement. Any such allowance shall be accounted for according to the procedures	
	established in the regulations promulgated pursuant to Title IV of the Act.	1

No.	Federally Enforceable General Permit Conditions	Regulations
38.	Title VI Requirements (Refrigerants)  Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR 82, Subpart F.  A. No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR 82, Subpart F.  B. The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR §82.166. Reports shall be submitted to the U.S. EPA and the	40 CFR 82 18.1.1(e)(10) 18.1.1(w)(4)
39.	Department as required.  Asbestos Demolition and Renovation  Demolition and renovation activities at this facility are subject to the National Emission  Standard for Asbestos, 40 CFR 61, Subpart M. To determine the applicable requirements of the Standard, the permittee must thoroughly inspect the affected part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing materials, prior to the commencement of the demolition or renovation operation. The permittee shall comply with all applicable sections of the Standard, including notification requirements, emission control and waste disposal procedures. The permittee shall also ensure that anyone performing asbestos-related work at the facility is trained and certified according to the Alabama Department of Environmental Management's regulations for Asbestos Contractor Certification.	40 CFR 61 14.2.12
40.	Prevention of Accidental Releases  The permittee shall comply with the requirements of §112(r) of the Act and 40 CFR 68 to prevent accidental releases of any substance listed pursuant to §112(r) or any other extremely hazardous substance.	112(r) 40 CFR 68
41.	Testing A source emissions test may be required by this Department at any time. The permittee shall provide each point of emission with sampling ports, ladders, stationary platforms, and other safety equipment to facilitate testing. The permittee shall notify the Department in writing at least 30 days prior to conducting any required emissions test on any source. This notice shall state the source to be tested, the proposed time and date(s) of the test, the purpose of the test, and the methods to be used. A site-specific test plan and quality assurance program shall be included for sources subject to NESHAP. The methods for such testing shall be in accordance with methods and procedures established by 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63 and any emissions unit specific permit requirements. Performance testing to demonstrate compliance with an NESHAP shall include a test method performance audit as required by §63.7(c)(2)(iii)(A). The permittee shall submit the results of all emissions tests in written form to this Department within a time period specified by this Department; however, not to exceed 60 days from the test completion date.	1.9.1 1.10 18.2.5 18.2.8(c) 63.7(a)(3) 63.7(b)-(d) 63.10(d)
42.	Retention of Records Records of all required monitoring data, fuel consumption, analyses, reports, safety data sheet (SDS), and other support information shall be retained for a minimum of 5 years from the date when the record was generated. Records must be readily accessible and suitable for inspection. Each record must be kept onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, but may be maintained offsite for the remaining 3 years. Records may be kept in hard copy or electronically. Specific records to be made and retained are listed in the emission unit conditions.	18.5.3(b) 63.10(b)(1) 63.3931

No.	Federally Enforceable General Permit Conditions	Regulations
	Facility-Specific General Conditions	
43.	Fugitive Dust The permittee shall take reasonable precautions to prevent dust from any operation, process, handling, storage, or transportation activity, including dust from paved and unpaved roads, at the facility from becoming airborne. The permittee shall not cause or allow the discharge of visible emissions which travel beyond the property line of the facility. Airborne fugitive dust emissions shall be prevented and addressed as needed and as appropriate to weather conditions using any or all of the following pre-approved control measures specific to the following sources of fugitive dust:  A. Plant roads: mechanical cleaning (vacuuming, washing or sweeping) and/or wet suppression;  B. Abrasive blasting operations:  1. Use of black beauty or other blasting material which is known to settle more rapidly than and/or cause fewer dust emissions than sand;  2. Temporary and/or permanent enclosures, which may be partial, to prevent fugitive dust from abrasive blasting operations from crossing property lines;  C. Materials used for abrasive blasting shall be prevented from becoming airborne when blasting operations are not occurring by using materials that do not typically become airborne due to winds, by using wet suppression, and/or by providing physical protection from winds; and  D. Unpaved areas of the property shall be maintained to reduce fugitive dust through wet suppression and/or vegetation.  Wet suppression may be accomplished by the application of water with or without the addition of surfactants, wetting agents or other additives to increase the effectiveness of wet suppression. Manufacturer's documentation of the contents of any chemical, surfactant, wetting agent, or other additive used for dust suppression shall be maintained and readily made available upon request by the Department. Other dust control methods not listed above may be used subject to Department approval. Additional requirements	6.2.1 6.2.2 18.2.4
	for recordkeeping, inspections and maintenance are included elsewhere in this permit.  Reports and Notifications for Entire Facility	
44.	Timing for Submission of Reports and Notifications  The permittee shall submit all reports and notifications required by any permit condition and by any applicable NESHAP and/or NSPS to the Department. The reports may be sent by U. S. mail or by electronic mail. Reports submitted by US mail shall be postmarked on or before the due date. Reports submitted by electronic mail shall be received on or before the due date, and a paper copy of the CTAC must be submitted as well. The information to be included in each report is listed in General Conditions 45 and 46 below. Any document required to be submitted by this permit shall contain a certification by a responsible official that meets the requirements of Section 18.4.9. The following reports are required to be submitted on the following schedule:  A. Annual Production and Emissions Report, due February 10 <sup>th</sup> of each year covering the pervious calendar year.	18.4.9 18.5.3(c) 18.7.1 18.7.5 18.11.2(b)(4) 18.7.6 63.9(j) 63.10(e)
	<ul> <li>B. Annual Title V Compliance Certification, covering the period from June 26<sup>th</sup> to June 25<sup>th</sup> of the following year, shall be submitted by July 25 each calendar year.</li> <li>C. 6-Month Monitoring Report for Title V and 40 CFR 63, Subpart MMMM, due July 31<sup>st</sup> (covering January 1<sup>st</sup> to June 30<sup>th</sup>) and January 31<sup>st</sup> (covering July 1<sup>st</sup> to December 31<sup>st</sup> of the previous year).</li> <li>D. Episodic prompt reporting of malfunctions, deviations, emergencies and violations from the permit within 2 working days of the malfunction, deviation, emergency or discovery of a violation, including the probable cause of the event and any corrective actions or preventive measures that were taken.</li> </ul>	

No.	Federally Enforceable General Permit Conditions	Regulations
	<ul> <li>E. Compliance schedule progress reports according to 18.7.4 if a compliance schedule is required.</li> <li>F. Notifications as follows: <ol> <li>Notify the Department in writing within 15 days of if you change any information submitted in any notification pursuant to Subpart MMMM.</li> <li>Notify the Department in writing within 2 working days of becoming subject to a federal Maximum Achievable Control Technology (MACT) standard pursuant to Section 112 of</li> </ol> </li> </ul>	
	the Act (local requirement).	1.5.15
45.	<ul> <li>Contents of Annual Production and Emissions Report  The permittee shall submit by February 10<sup>th</sup> of each year to this Department an annual summary report for the previous calendar year in a format approved by this Department of the following production information for each emissions unit permitted herein:  A. The hours of operation for surface coating and abrasive blasting operations;  B. The total quantity in gallons of surface coatings, organic solvent thinners and cleanup solvents used;  C. The quantity in gallons of waste surface coatings, solvent thinners and cleanup solvents disposed of properly (i.e.: sent to a waste solvent recovery facility or incinerated);  D. The quantity and type of material used for abrasive blasting;  E. The quantity of fuel combusted by heating equipment and mobile equipment;  The quantity of VOC and/or HAP material emitted to the atmosphere as a result of spills and other mishaps; and</li> </ul>	
£	<ul> <li>G. The actual calendar year emissions (point and fugitive) of all regulated air pollutants, including but not necessarily limited to TSP, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>X</sub>, CO, VOC, and SO<sub>X</sub>, and all HAP based upon the above calendar year records.</li> <li>The submission shall include a certification by a responsible official of the truth, accuracy and completeness of the report. The report shall contain sufficient detail of the VOC and HAP contents of each product used in surface coating to allow the Department to verify the emissions calculations. Concurrence with the calculations by the Department shall be the basis for annual emission fees in accordance with Chapter 16 of the Rules</li> </ul>	
46.	and Regulations.  Contents of Title V Submissions	18.4.9
40.	Any document or report submitted under this requirement shall contain a certification of truth, accuracy, and completeness by a responsible official that meets the requirements of Section 18.4.9 of the Rules and Regulations. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. These documents shall be submitted to the following 2 agencies:  Jefferson County Department of Health EPA Region IV	18.7.1 18.7.5 18.5.3(c)(2) 18.11.2(b)(4) 63.3920(a) 63.3930 63.3942(c) 63.3952(c)
	Air Pollution Control Program and to Atlanta Federal Center P.O. Box 2648 61 Forsyth Street Birmingham, Alabama 35202-2648 Atlanta, GA 30303	63.10(b) 63.10(d) 63.9(j)
	<ul> <li>A. Title V Annual Compliance Certification: A compliance certification covering the period from June 26 to June 25 of the following year, shall be submitted by July 26 each calendar year. The permittee shall provide a means for monitoring the compliance of its air pollution sources with the emissions limitation, standards and work practices listed or referenced within this permit. The compliance certification shall include the following: <ol> <li>The identification of each term or condition of this permit that is being certified;</li> <li>The emission unit or units to which the term or condition applies;</li> <li>The compliance status;</li> <li>Whether compliance has been continuous or intermittent;</li> </ol> </li> </ul>	

No.	Federally Enforceable General Permit Conditions	Regulations
	<ul> <li>5. The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with the Rules and Regulations; and</li> <li>6. Such other facts as the Department may require to determine the compliance status of the source, including but not limited to identifying each deviation that occurred.</li> </ul>	
	<ul> <li>B. Semi-Annual Monitoring Report for Title V and 40 CFR 63, Subpart MMMM: A semiannual compliance report shall be submitted within 31 days after the 6-month reporting period (January—June and July—December), according to the requirements in §63.10(e) and including the following elements: <ol> <li>Company name and address;</li> <li>Date of the report and beginning and ending dates of the reporting period;</li> <li>Identification of the compliance option or options used on each coating operation during the reporting period, including the beginning and ending dates for each option used if more than one option was used during the reporting period.</li> <li>The calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period if the emission rate without add-on controls option has been used.</li> <li>If there are no deviations from any organic HAP emissions limit, a statement that there were no deviations from the organic HAP emissions limit during the reporting period including the basis for compliance as follows for the options below:  <ul> <li>a. For the compliant materials options, because no coatings which exceeded the applicable emission limit were used and no thinner and/or additive, or cleaning material containing organic HAP was used.</li> <li>b. For the emission rate without add-on controls option, because the organic HAP emission rate for each compliance period was less than or</li> </ul> </li> </ol></li></ul>	
	equal to the applicable emission limit.  6. Any and all instances of deviation from any permit condition during the reporting period must be clearly identified. For sources covered under 40 CFR 63, Subpart MMMM, report the information listed at 40 CFR 63.3920(a)(5) for the complaint material option and/or the information listed at 40 CFR 63.3920(a)(6) for the emission rate without add-on controls option.  7. A failure to collect and keep records required by Subpart MMMM shall be reported as a deviation.	
47.	Mandatory Greenhouse Gas Reporting (for informational purposes only)  The permittee shall be aware that the facility may be required to report emissions of greenhouse gases directly to EPA under the Mandatory Greenhouse Gas Reporting rules.  The reporting threshold is annual greenhouse gas emissions equal to 25,000 metric tons CO <sub>2</sub> e, calculated using the methods presented in 40 CFR 98. Mandatory greenhouse gas reporting is made directly to EPA and is not an enforceable requirement of this Title V Major Source Operating Permit. It is the permittee's responsibility to determine whether reporting is required each calendar year.	40 CFR 98

# <u>Summary of Requirements For Surface Coating of Miscellaneous Metal Parts And Products</u> <u>Subject to 40 CFR 63, Subpart MMMM</u>

Description:

Manual Spray, Brush, Roll Painting and Semi-Automatic Spray Lance Painting

Permitted Operating Schedule:

24 hours/day, 7 days/week, and 52 weeks/year

Type of Fuel Used:

Primary: Secondary: None None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Regulations
VOC from Air-Dried Coatings	0.42 kg VOC/liter coating (3.5 lb VOC/gallon coating) as applied	8.11.11(e)(2)
Organic HAP from General Use Coatings	0.31 kg organic HAP/liter coating solids (2.6 lb organic HAP/gallon coating solids)	63.3890(b) of Subpart MMMM
Visible Emissions	20% opacity as a 6-minute average	6.1.1
Fugitive Dust	N/A	Part 6.2
Nuisance Odor	N/A	Section 6.2.3

Pollution Control Devices:

None

Reference Test Methods:

For Organic HAP:

Mass Fraction of Organic HAP by EPA Method 311 of 40 CFR 63,

Appendix A; or

Mass Fraction of Non-aqueous Volatile Material by EPA Method 24 of 40

CFR 60, Appendix A;

For Coating Solids:

Volume Fraction of Coating Solids by ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003)

For Density:

Density of Coatings by ASTM Method D1475-98

For VOC Content:

EPA Method 24 of 40 CFR 60, Appendix A

Continuous Monitoring System:

Not applicable

Monitoring Requirements:

Records per Condition 15

Compliance Demonstration Calculations per Conditions 7 – 10

Recordkeeping Requirements:

Condition 15, General Condition 42

Testing Requirements:

Condition 7, General Condition 41

Reporting Requirements:

General Conditions 44 through 46

Applicable Regulations:

Parts 6.1 & 6.2; Sections 8.1.2, 8.11.11, 8.11.12, 8.16.7, 18.2.4, & 18.5.3;

40 CFR 63, Subparts A & MMMM

# FEDERALLY ENFORCEABLE CONDITIONS FOR THE SURFACE COATING OF MISCELLANEOUS METAL PARTS & PRODUCTS SUBJECT TO 40 CFR 63, SUBPART MMMM

Emission Unit	Emission Unit Description	Equipment Listing
001	Facility-Wide Surface Coating of Miscellaneous Metal Parts and Products Subject to 40 CFR 63, Subpart MMMM	Manual Spray, Brush, Roll Painting and Semi- Automatic Spray Lance Painting

No.	Federally Enforceable Conditions for the Surface Coating of Miscellaneous Metal Parts & Products Subject to 40 CFR 63, Subpart MMMM	Regulations
	Applicability	
1.	State Implementation Plan Emission Unit 001 consists of all parts of the facility engaged in surface coating of miscellaneous metal parts and products. It is subject to Parts 6.1 and 6.2 of the Rules and Regulations regulating particulate emissions, and to Sections 8.11.11 and 8.12 regulating surface coating operations.	6.1 6.2 8.11.11 8.11.12
2.	<ul> <li>40 CFR 63, Subpart MMMM The surface coating facility is an existing general use coating affected source (not constructed or reconstructed after August 13, 2002) under 40 CFR 63, Subpart MMMM. The affected source of the collection of all items listed below that are used for surface coating of miscellaneous metal parts and products: A. All coating operations from the point at which a coating or cleaning material containing HAP is applied to a metal part and all subsequent points in the operation where organic HAP is emitted, including equipment used to: <ol> <li>Apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating;</li> <li>Apply coating to a substrate (coating application) and to dry or cure the coating after application; or</li> <li>Clean coating operation equipment (equipment cleaning).</li> </ol> </li> <li>B. All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed</li> <li>All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and</li> <li>All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.</li> <li>Table 2 of Subpart MMMM identifies which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply. Permitting under Chapter 18 (Title V) is required because the facility was a major source under Section 112 of the Act when the NESHAP was promulgated (January 2, 2004) and remained a major source on the compliance date (January 2, 2007).</li> </ul>	63.3881 63.3882 63.3883 63.3901 63.3981
3.	NESHAP General Duty  At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.	63.6(e)(1)(i) 63.3900(b)

No.	Federally Enforceable Conditions for the Parts & Products Subject to		Regulations
	Emission I	imitations	
4.	VOC/HAP Emission Limits The permittee shall not discharge emissions in excess of the rates appearing in the table below from coating operations:		8.11.11(e)(2) 8.1.2 63.3890(b) 63.3900(a)(1)
	Emission Restriction Citation		03.3700(a)(1)
	0.42 kg VOC/liter coating (3.5 lb VOC/gallon coating) as applied during each 24-hour calendar day	8.11.11(e)(2)	
	0.31 kg organic HAP/liter coating solids (2.6 lb organic HAP/gallon coating solids) for general use coatings used during the 12-month compliance period	63.3890(b)(1) of Subpart MMMM	
	The permittee shall be in compliance with the Plant-wide, the permittee may exempt up to a use coatings as a 12-month rolling total which	n aggregate quantity of 55 gallons of all low-	
5.	Annual VOC Emission Limitation The permittee shall not emit greater than 237. total from this emission unit. This condition v		18.2.4
6.	Visible Emissions The permittee shall not discharge into the atm any air contaminant with an opacity greater the average using EPA Method 9 of 40 CFR 60, A period in any 60-minute period, particulate end but not exceed 40% opacity. Adequate contain abrasive blasting operations. The permittee she visible fugitive dust emissions beyond the lot originate. If dust escapes from a building or excause a nuisance or to violate any rule or regulting type of the building is treated by removal of air contains.	nan 20%, as determined by a 6-minute Appendix A, except that during (1) 6-minute nissions from a source of emission may reach ment methods shall be employed during hall not cause or allow the discharge of line of the property on which the emissions quipment in such a manner and amount as to distion, the permittee shall be required to hich a way that all air borne material leaving minants before discharge to the open air.	6.1.1 6.2.1(c) 6.2.2 6.2.3
	Compliance De	·-···	
7.	VOC Emission Limit Compliance Demonst The compliance demonstration time frame for coatings that are subject to the same regulated a 24-hour calendar day. The daily calculation and additives. Compliance is based on the corapplicator and applied to the metal part or pro VOC and HAP contents of each product used Appendix A. Alternatively, the permittee may the manufacturer as allowed by paragraph 8.1 Sufficient data to determine as-applied formulation is different from the as-purchased	r an individual coating line that applies I VOC emission rate under Part 8.11 shall be shall include all coatings, diluents, thinners needs of the coating as delivered to the duct. Test procedures used to determine the shall be EPA Method 24 of 40 CFR 60, or rely upon certification of the contents by 6.7(d) of the Rules and Regulations.	8.11.12(b) 8.11.12(d) 8.11.11(e) 8.16.7
8.	55-Gallon Low-Use Coating Exemption Co Within the first 2 weeks of each calendar mon in gallons of all low-use coatings which exceed The permittee shall then sum the monthly total compare the total low-use coating usage to the maintain a record of these calculations.	mpliance Demonstration  Anth, the permittee shall calculate the total use and the applicable VOC contents limitation.  Als for the most recent 12 months and	18.5.3

No.	Federally Enforceable Conditions for the Surface Coating of Miscellaneous Metal Parts & Products Subject to 40 CFR 63, Subpart MMMM	Regulations
).	Annual VOC Emission Limitation Compliance Demonstration Within the first 2 weeks of each calendar month, the permittee shall calculate the total VOC emissions from this emissions unit. The permittee shall then sum the monthly totals for the most recent 12 months and compare the calculated VOC emissions to the 237.75 tons/year of VOC emission limitation. The permittee shall maintain a record of these	18.5.3
	calculations.	62 2201
10.	Subpart MMMM Compliance Determination  The permittee shall include all coatings, thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit. The permittee shall use either the complaint materials option or the emission rate without add-on controls option according to the following rules:  A. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source.	63.3891 63.3930 63.3942 63.3952
	<ul> <li>B. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation.</li> <li>C. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts.</li> <li>D. The permittee may not use different compliance options at the same time on the same coating operation.</li> <li>E. The permittee must identify the compliance option used for each coating operation.</li> <li>F. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee shall document this switch as required by 40 CFR 63.3930(c), and shall report it in the next semiannual compliance report.</li> <li>G. A compliance period consists of 12 months.</li> <li>H. Failure to collect and keep records required by Subpart MMMM is a deviation.</li> <li>I. A deviation from emission limits is defined as follows:</li> <li>1. For the compliant materials option, the use of any coating that exceeds the organic HAP emission unit and/or the use of any thinner and/or other additive, or cleaning material that contains organic HAP; and</li> <li>2. For the emission rate without add-on controls option, if the organic HAP emission rate for any 12-month compliance period exceeds the applicable</li> </ul>	
1.	emission limit a deviation has occurred.  Subpart MMMM – Complaint Materials Option	63.3891(a)
•	Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit, and that each thinner and/or other additive, and cleaning material contains no organic HAP. The compliance calculation shall use the equations and procedure at 40 CFR 63.3941 and is made on the basis of the condition in which the material is received from the manufacturer or supplier and prior to any alteration. No operating limits or work practice standards are required.	63.3892(a) 63.3893(a) 63.3941
12.	Subpart MMMM – Emission Rate Without Add-On Controls Option  Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated each month as a rolling 12-month emission rate. Do not include any coatings, thinners and/or other additives used in coating operations for which compliance is demonstrated using the complaint materials option. The compliance calculation shall use the equations and the procedure at 40 CFR 63.3951. No operating limits or work practice standards are required.	63.3891(b) 63.3892(a) 63.3893(a) 63.3951 63.3952
3.	Subpart MMMM – Emission Rate With Add-on Controls Option  Applications shall be submitted prior to the installation of any add-on control device used for compliance with emission limits for organic HAP and a permit modification will be required to add newly applicable requirements prior to operating an add-on control device.	63.3891(c)

No.	Federally Enforceable Conditions for the Surface Coating of Miscellaneous Metal Parts & Products Subject to 40 CFR 63, Subpart MMMM	Regulations
	Work Practices	
14.	Waste Paint and Solvent Disposal  The permittee shall collect and properly contain as much as possible of the waste solvent and paint that's not reusable. The permittee shall not cause or allow the disposal of waste VOC/HAP containing materials in sewers, open containers, or in any manner that would result in vaporization to the atmosphere. Records of the method of disposal shall be maintained. This solvent cannot be used as a diluent for the surface coatings unless properly documented and the use does not cause the as-applied VOC and/or HAP content to exceed any applicable VOC or HAP restriction.	18.2.4
	Recordkeeping	
15.	Required Records The permittee shall maintain the following records in a manner that they can be readily accessed and are suitable for inspection for 5 years following the date of each occurrence, report or record:  A. Hours of operation and products used for surface coating operations;  B. For any spill of VOC/HAP materials: the date and time of the spill, the substance	18.5.3(b) 63.10(b) 63.3931 18.5.3 18.5.3
	<ul> <li>spilled, the quantity spilled, and the quantity recovered and/or emitted to the atmosphere;</li> <li>C. The quantity in gallons of all organic liquid waste properly contained and shipped out for proper disposal and a certification of the waste density and percent VOC content by weight, if credit is to be applied to the annual emissions calculation;</li> <li>D. Current documentation of the VOC content in percent weight, the mass fraction of organic HAP, and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating (manufacturer's formulation data, or for testing, the summary sheet of test results provided by the manufacturer or supplier or the complete test report if tested independently).</li> <li>E. Daily dated records for each coating line necessary to verify compliance with the VOC emission limit and the 55-gallon low-use exemption: <ol> <li>The quantity in gallons of all surface coatings delivered to the application system;</li> <li>The quantity in gallons of all organic liquid diluents (coating thinners and additives) added to the surface coatings;</li> <li>The quantity in gallons of all organic liquid solvents used for wash or cleanup;</li> <li>The regulation(s) applicable to the coating line for which the records are being maintained;</li> <li>The application method and the substrate material type;</li> <li>The surface coating curing temperature(s) in degrees Fahrenheit;</li> <li>The daily VOC content compliance calculation(s); and</li> </ol> </li> </ul>	8.11.12 63.3930(b) 63.3930(e) 8.11.12 8.1.2 18.5.3(b)
	<ol> <li>The daily VOC content compriance calculation(s), and</li> <li>The amount of coating applied in excess of the applicable VOC content limit to be included in the 55-gallon low-use exemption calculation.</li> <li>For Subpart MMMM compliance:         <ol> <li>The coating operations on which each compliance option was used and the time periods (beginning and ending dates and times) for each option;</li> <li>The name and volume of each coating, thinner and/or other additive, and cleaning material used;</li> <li>A record of the volume fraction of coating solids and the mass fraction of organic HAP and density for all products used during the compliance period;</li> <li>The calculation of each 12-month organic HAP emission rate;</li> </ol> </li> <li>For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR §63.3941;</li> </ol>	63.3930(c)(1) 63.3930(e) 63.3930(f) 63.3930(g)

No.	Fee	derally	Enforceable Conditions for the Surface Coating of Miscellaneous Metal Parts & Products Subject to 40 CFR 63, Subpart MMMM	Regulations
	(	a.	The emission rate without add-on controls option, a record of the following: The calculations of total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of 40 CFR §63.3951; If applicable, the calculation used to determine mass of organic HAP in	63.3930(c)(3)
		b. с.	waste materials according to 40 CFR §63.3951(e)(4); The calculation of the total volume of coating solids used each month using	
		d.	Equation 2 of 40 CFR §63.3951; and The calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR §63.3951.	
		cor	using an allowance in Equation 1 of 40 CFR 63.3951(e)(4) for organic HAP intained in waste materials sent to or designated for shipment to a treatment, rage, and disposal facility (TSDF) as allowed by 40 CFR 63.3951:  The name and address of each TSDF to which you sent these waste materials; a statement of which subparts under 40 CFR 262, 264, 265, and 266 apply to the facility; and the date of each shipment;  Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials; and  The methodology used to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials, including the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.	63.3930(h)
	H. A. I. C. S. S. t.	A copy The occ or any c said ma the ever	d of the date, time and duration of each deviation from Subpart MMMM; of each notification and report submitted to comply with Subpart MMMM; currence and duration of any malfunction of process and/or control equipment deviation or violation of permit conditions, including the probable cause of lfunctions, deviations or violations, written documentation demonstrating that not falls under the Department's emergency provision if appropriate, and any ve actions or preventive measures that were taken.	63.3930(j) 63.3930(a) 18.5.3

### **Summary of Requirements For Abrasive Blasting Operations**

Description:

Facility-Wide Abrasive Blasting Operations

Permitted Operating Schedule:

24 hours/day, 7 days/week, and 52 weeks/year

Type of Fuel Used:

Primary: Secondary: None None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Regulations	
Visible Emissions	20% opacity as a 6-minute average	6.1.1	
Fugitive Dust	No Visible Emissions May Travel Beyond the Property Line	6.2.2	

Pollution Control Devices:

None

Reference Test Methods:

For Visible Emissions:

EPA Method 9 of 40 CFR 60, Appendix A

Continuous Monitoring System:

Not applicable

Monitoring Requirements:

Visible Emission Observation per Condition 3

Recordkeeping Requirements:

Condition 4, General Condition 42

Testing Requirements:

General Condition 41

Reporting Requirements:

General Conditions 44 through 46

Applicable Regulations:

Chapters 6 & 18

## FEDERALLY ENFORCEABLE CONDITIONS FOR ABRASIVE BLASTING OPERATIONS

Emissions Unit No.	Emissions Unit Description
008	Abrasive Blasting Operations

No.	Federally Enforceable Conditions for Abrasive Blasting Operations	Regulations
1.	The facility-wide abrasive blasting operations subject to the requirements below shall	6.1
	include any equipment, device, or contrivance and all appurtenances thereto,	6.2
	including abrasive blasting materials, abrasive blasting material storage and feeding	Chapter 18
	equipment, and permanent and/or temporary full and partial enclosures.	
	A. Part 6.1 of the Rules and Regulations regulating visible emissions;	
	B. Part 6.2 of the Rules and Regulations regulating fugitive dust; and	
	C. Chapter 18 of the Rules and Regulations regulating Title V major source permitting.	
2.	Visible Emissions and Fugitive Dust Emissions	6.1.1
_,	A. The permittee shall not discharge into the atmosphere from abrasive blasting	
	operations or any other source of emission any air contaminant with an opacity	
	greater than 20%, as determined by a 6-minute average using EPA Method 9 of	
	40 CFR 60, Appendix A, except that during (1) 6-minute period in any 60-minute	
	period, particulate emissions from a source of emission may reach but not exceed	
	40% opacity.	
	B. The permittee shall not cause or permit the discharge of visible fugitive dust	6.2.2
	emissions beyond the lot line of the property on which the emissions originate.	
	C. The permittee shall employ adequate containment methods during abrasive	6.2.1(c)
	blasting operations.	
	D. If dust from the abrasive blasting operation escapes from the property in such a	6.2.3
	manner and amount as to cause a nuisance or to violate any rule or regulation, the	
	permittee shall be required to tightly enclose the equipment in such a way that air	
	borne material leaving the equipment is prevented from leaving the enclosure or	
	treated by removal of air contaminants before discharge to the open air.	
3.	Visible Emission Observation	6.2
	When wind conditions are conducive to carrying fugitive particulate matter from	18.5.3
	abrasive blasting operations beyond the property line, the permittee shall either	
	postpone abrasive blasting operations until the excessive winds have subsided or	
	observe the travel of fugitive emissions and take any additional measures needed to	
	prevent visible emissions (dust) from crossing the plant property line.	1.5.15
4.	Recordkeeping	1.5.15 1.9
	The permittee shall maintain the following records for the emissions unit listed above:	1.12
	A. The amount of abrasive blasting material consumed and the amount of abrasive	18.5.3
	blasting material disposed of;	10.3.3
	B. The actual hours of operation; C.	
	D. Time, date, name of observer for visible emissions observations; and	
	E. The malfunction of any equipment which increased the emission of air pollutants,	
	including the times, dates and nature of the malfunction and of corrective actions.	

Vulcan Pipe & Steel Coatings, Inc. Permit No. 4-07-0423-05

### **Summary of Requirements For Powder Coating Operations**

Description:

Powder Coating Booth with 1.5 MMBtu/hr Natural Gas Drying Oven

Permitted Operating Schedule:

24 hours/day, 7 days/week, and 52 weeks/year

Type of Fuel Used:

Primary: Secondary:

None

None

Pollutants Emitted:

Pollutant		Regulatory Emission Limit	Applicable Regulations
	VOC from Powder Coating	0.05 kg VOC/liter coating (0.4 lb VOC/gallon coating) as applied	8.11.11(e)(5)
	Visible Emissions	20% opacity as a 6-minute average	6.1.1

Pollution Control Devices:

None

Reference Test Methods:

For Density:

Density of Coatings by ASTM Method D1475-98

For VOC Content:

EPA Method 24 of 40 CFR 60, Appendix A

Monitoring Requirements:

Daily Records for Powder Coating per Condition 7

Records of Visible Emission Observations per Condition 6

Recordkeeping Requirements:

Condition 7, General Condition 42

Testing Requirements:

Condition 7, General Condition 41

Reporting Requirements:

General Conditions 44 through 47

Applicable Regulations:

Sections 8.11.11, 8.11.12, 8.16.7, 18.5.1, 18.5.3

## FEDERALLY ENFORCEABLE CONDITIONS FOR POWDER COATING OPERATIONS

Emissions	Unit No.	Emissions Unit Description
009	9	Powder Coating Booth with 1.5 MMBtu/hr Natural Gas Drying Oven

No.	Federally Enforceable Conditions for Powder Coating Operations	Regulations
1.	Visible Emissions The permittee shall not discharge into the atmosphere from any source of emission any air contaminant with an opacity greater than 20%, as determined by a 6-minute average using EPA Method 9 of 40 CFR 60, Appendix A, except that during (1) 6-minute period in any 60-minute period, particulate emissions from a source of emission may reach but not exceed 40% opacity.	6.1.1
2.	VOC Emission Limit The permittee shall not cause or allow emissions of VOC from powder coating operations to exceed 0.05 kilograms per liter (0.4 pounds per gallon), excluding water, as delivered by the application system.	8.11.11(e)(5)
3.	Fuel Combustion The permittee shall not cause or permit the operation of a fuel combustion unit in such a manner that emissions of pollutants exceed the following limits:  A. For sulfur oxides, measured as SO <sub>2</sub> , 1.8 lb per MMBTU heat input; and B. For particulate matter, 0.5 lb per MMBTU heat input. Records of the combustion of natural gas shall indicate compliance with this provision. Combustion of alternate fuels in the drying oven shall require prior Department approval.	6.3 7.1.1
4.	Particulate Emissions Limit The permittee shall not cause or allow emissions of particulate matter from any source to exceed the allowable particulate matter emission rate (pounds/hour) in Table 6-2 of the Rules and Regulations. Interpolation for process weight rates not printed in the table shall be accomplished with the use of the following equations:  A. For process weight rates of less than 30 tons/hour:	6.4.1 6.4.3
	$E = 3.59  p^{0.62}$	
	B. For process weight rates equal to or greater than 30 tons/hour:	
	$E = 17.31  p^{0.16}$ Where: E = emission rate in pounds/hour for all similar process units, and $p = process weight rate in tons/hour.$	
5.	<ul> <li>Maintenance of Controls</li> <li>A. The permittee shall equip each fabric filter particulate matter control device with a pressure differential measuring device to measure the pressure drop across the filter media in the control device. The device shall be installed in a location which is easily accessible for inspection by Department personnel.</li> <li>B. All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in accordance with the manufacturer's specifications or alternative procedures approved by the Department 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 emissions of air contaminants shall be maintained near the source and provided to the Department upon request.</li> </ul>	18.2.4 18.5.3(a)(2)
	C. The permittee shall conduct routine inspections on all required control equipment. All inspection results and repair work performed on the pollution control device shall be recorded. These records shall be kept in a permanent form suitable for inspection.	

No.	Federally Enforceable Conditions for Powder Coating Operations	Regulations
	D. A record shall be made each time the filters are replaced, including the date of replacement and the manufacturer, model number, and rated efficiency of the replacement filters. The date and nature of any other maintenance activity shall also be recorded, including a notation of whether the equipment the filter is used to control was operating during the maintenance period.	
6.	Visible Emissions Observations and Recordkeeping	1.9.1
	The permittee shall observe each baghouse discharge stack which exhausts outside the building envelope at least once each month while the source and baghouse are operating for a period of at least 5 minutes in accordance with EPA Method 22, 40 CFR 60, Appendix A. The observer shall permanently record the time and date of the observation, the equipment observed, and the presence or absence of any visible emissions. If visible emissions are observed, corrective actions to eliminate the visible emissions shall be initiated within 1 hour. Within 24 hours of the completion of the corrective activities, the permittee shall again observe the baghouse discharge stack. If visible emissions are present, a certified observer shall complete a visible emissions evaluation using EPA Method 9 within 3 working days to establish compliance with the opacity limitation in Condition 3 above. The date, time and nature of the corrective actions were completed shall be included with the same record that contained the initial observation.	18.5.3
7.	<ul> <li>Recordkeeping and Compliance Monitoring for Powder Coating Operations</li> <li>The compliance demonstration time frame for the VOC emission limits for the Powder Coating Operation shall be a 24-hour period (calendar day). The following records shall be maintained for each day the coating line operates as a minimum:</li> <li>A. The quantity in gallons or pounds of all powder surface coatings delivered to the application system;</li> <li>B. The VOC and HAP content of the as-applied coatings;</li> <li>C. The quantity in gallons of all organic liquid solvents used for wash or cleanup;</li> <li>D. The drying oven temperature (if operating); and</li> <li>E. The date for which the operating record is made.</li> <li>Test procedures used to determine the VOC and HAP contents of each product used shall be EPA Method 24 of 40 CFR 60, Appendix A. Alternatively, the permittee may rely upon certification of the contents by the manufacturer consistent with EPA Document 450/3-84-019, "Procedures for Certifying Quantity of VOC Emitted by Paint, Ink and Other Coatings." Sufficient data to determine as-applied formulation must be provided if the as-applied formulation is different from the as-purchased coating. Purchase and usage records shall be available for inspection by the Department.</li> </ul>	8.11.12 1.9.1 18.5.3 8.16.7

## APPENDIX A: CROSS-REFERENCE TABLE: JCDH AIR POLLUTION CONTROL RULES AND REGULATIONS TO STATE IMPLEMENTATION PLAN

The citations to Alabama regulations provided below refer to the version of the regulation that has been approved by the U.S. EPA as part of Alabama's Clean Air Act state implementation plan (SIP), as identified in 40 CFR 52, Subpart B. In the event that there is a discrepancy between the information provided in the table below and the federal regulatory table identifying the Alabama SIP at 40 CFR 52, Subpart B, the federal regulatory table governs.

JCDH Citation	State Citation	Title/Subject
Chapter 1	Chapter No. 335-3-1	General Provisions
Part 1.1	Section 335-3-101	Purpose
Part 1.3	Section 335-3-1021	Definitions
Part 1.7	Section 335-3-103	Ambient Air Quality Standards
Part 1.9	Section 335-3-104	Monitoring, Records, and Reporting
Part 1.10	Section-335-3-105	Sampling and Test Methods
Part 1.11	Section 335-3-106	Compliance Schedule
Part 1.12	Section 335-3-107	Maintenance and Malfunctioning of Equipment; Reporting
Part 1.13	Section 335-3-108	Prohibition of Air Pollution
Sections 3.2.1 – 3.2.4 & Part 3.4	Section 335-3-109	Variances
Part 1.15	Section 335-3-110	Circumvention
Part 1.16	Section 335-3-111	Severability
Part 1.17	Section 335-3-112	Bubble Provision
Part 1.18	Section 335-3-113	Credible Evidence
Part 1.20	Section 335-3-115	Emissions Inventory Reporting Requirements
Chapter 2	Chapter No. 335-3-14	Air Permits
Part 2.1	Section 335-3-1401	General Provisions
Part 2.2, except 2.2.4(h)	Section 335-3-1402	Permit Procedures
Part 2.3	Section 335-3-1403	Standards for Granting Permits
Part 2.4	Section 335-3-1404 <sup>2</sup> , <sup>3</sup>	Air Permits Authorizing Construction in Clean Air Areas
		[Prevention of Significant Deterioration (PSD)]
Part 2.5	Section 335-3-1405 <sup>4</sup>	Air Permits Authorizing Construction in or Near
		Nonattainment Areas
Chapter 4	Chapter No. 335-3-2	Air Pollution Emergency
Part 4.1	Section 335-3-201	Air Pollution Emergency
Part 4.3	Section 335-3-202	Episode Criteria
Part 4.4	Section 335-3-203	Special Episode Crîteria
Part 4.5	Section 335-3-204	Emission Reduction Plans
Part 4.6	Section 335-3-205	Two Contaminant Episode
Part 4.7	Section 335-3-206	General Episodes
Part 4.8	Section 335-3-207	Local Episodes
Part 4.9	Section 335-3-208	Other Sources
Section 4.2.3	Section 335-3-209	Other Authority Not Affected
Chapter 5	Chapter No. 335-3-3	Control of Open Burning and Incineration
Sections 5.1.1 – 5.1.5 <sup>5</sup>	Section 335-3-301	Open Burning

<sup>&</sup>lt;sup>1</sup> Revisions of the definition of VOC to exclude *trans* 1-chloro-3,3,3-trifluoroprop-1-ene (Solstice™ 1233zs(E)), 2,3,3,3-tetrafluoropropene, and 2-amino-2-methyl-1-propanol (AMP) have not been approved into the SIP.

<sup>3</sup> As of Sept. 26, 2012 Section 335-3-14-.04 does not include Alabama's revision to adopt the PM<sub>2.5</sub> SILs threshold and provisions (as promulgated in the October 20, 2010 PM<sub>2.5</sub> PSD Increment-SILs-SMC Rule at 40 CFR 1.166(k)(2) and the term "particulate matter emissions" (as promulgated in the May 16, 2008 NSR PM<sub>2.5</sub> Rule (as 40 CFR 51.166(b)(49)(vi)).

<sup>&</sup>lt;sup>2</sup> Revisions to the following provisions have not been approved as SIP changes by EPA: the permitting applicability statement for greenhouse gases at ADEM 335-3-14-.04(1)(k) (JCDH 2.4.1(k)) and the definition of replacement unit at ADEM 335-3-14-.04(2)(bbb) (JCDH 2.4.2(bbb)).

<sup>&</sup>lt;sup>4</sup> The following provisions are not part of the EPA-approved SIP: the portion of 335-3-14-.05(1)(k) (JCDH 2.5.1(k)) stating "excluding ethanol production facilities that produce ethanol by natural fermentation"; 335-3-14-.05(2)(e)3. (JCDH 2.5.2(e)(3)) which addresses fugitive emission increases and decreases; 335-3-14-.05(1)(h) (JCDH 2.5.1(h)) stating the actual-to-potential test for projects that only involve existing emissions units; the last sentence at 335-3-14-.05(3)(g) (JCDH 2.5.3(g)), stating "interpollutant offsets shall be determined based on the following ratios"; and the NNSR interpollutant ratios at 335-3-14-.05(3)(g)1.-4. (JCDH 2.5.3(g)(1)-(4)).

<sup>&</sup>lt;sup>5</sup> See also Guidelines & Standard Operating Procedures for Issuance of Open Burning Authorizations at the end of Chapter 5. ADEM 335-3-3-.01(2)(b)(6) also prohibits open burning during declared air stagnation advisories and drought emergencies.

JCDH Citation	State Citation	Title/Subject
Part 5.2	Section 335-3-302	Incinerators
Part 5.36, except 5.3.4	Section 335-3-303	Incineration of Wood, Peanut, and Cotton Ginning Waste
Chapter 6	Chapter No. 335-3-4	Control of Particulate Emissions
Sections 6.1.1 & 6.1.2	Section 335-3-4017	Visible Emissions
Part 6.2	Section 335-3-4028	Fugitive Dust and Fugitive Emissions
Part 6.3	Section 335-3-403	Fuel Burning Equipment
Part 6.4	Section 335-3-404	Process Industries—General
Part 6.59	Section 335-3-405	Small Foundry Cupola
Part 6.6 <sup>10</sup>	Section 335-3-406	Cotton Gins
Part 6.7	Section 335-3-407	Kraft Pulp Mills
Part 6.8	Section 335-3-408	Wood Waste Boilers
Part 6.9	Section 335-3-409	Coke Ovens
Part 6.10	Section 335-3-411	Cement Plants
Part 6.12	Section 335-3-412	Xylene Oxidation Process
No equivalent provision	Section 335-3-414	Grain Elevators
No equivalent provision	Section 335-3-415	Secondary Lead Smelters
Chapter 7	Chapter No. 335-3-5	Control of Sulfur Compound Emissions
Part 7.1	Section 335-3-501	Fuel Combustions
Part 7.2 is not equivalent	Section 335-3-502	Sulfuric Acid Plants
No equivalent provision	Section 335-3-503	Petroleum Production
No equivalent provision	Section 335-3-504	Kraft Pulp Mills
No equivalent provision	Section 335-3-505	Process Industries—General
Parts 7.6 through 7.36	Sections 335-3-506 through 335-3-536	TR SO <sub>2</sub> Trading Program
Chapter 8	Chapter No. 335-3-6	Control of Volatile Organic Compound (VOC) Emissions
Part 8.111	Section 335-3-624	Applicability
Part 8.2	Section 335-3-625	VOC Water Separation
Part 8.3	Section 335-3-626 <sup>12</sup> ,13	Loading and Storage of VOC
Part 8.4	Section 335-3-627	Fixed-Roof Petroleum Liquid Storage Vessels
Part 8.5	Section 335-3-628	Bulk Gasoline Plants
Part 8.6	Section 335-3-629	Gasoline Terminals
Part 8.7, except 8.7.4(b) & 8.7.5(e)	Section 335-3-630	Gasoline Dispensing Facilities Stage 1
Part 8.11	Section 335-3-632	Surface Coating
Part 8.12	Section 335-3-63314	Solvent Metal Cleaning
Part 8.13	Section 335-3-634	Cutback and Emulsified Asphalt
Part 8.15	Section 335-3-636	Compliances Schedules
Part 8.16 <sup>15</sup>	Section 335-3-637	Test Methods and Procedures
Part 8.18	Section 335-3-639	Manufacture of Synthesized Pharmaceutical Products

<sup>6</sup> JCDH has no equivalent for ADEM 335-3-3-.03(5), which states "Each incinerator subject to this Rule shall be properly designed, equipped, and maintained for its maximum rated burning capacity and shall be equipped with an underfire forced air system, an over-fire air recirculation secondary construction system, and variable control damper, all of which shall be electronically controlled to insure the optimum temperature range for the complete combustion of the amount and type of material waste being charged into the incinerator. Each such incinerator shall be equipped with a temperature recorder which shall be operated continuously with the incinerator, and the temperature records shall be made available for inspection at the request of the Director."

<sup>&</sup>lt;sup>7</sup> ADEM 335-3-4-01(1) & (2) are included in the EPA-approved SIP, however, the remaining provisions are not SIP-approved.

<sup>8</sup> ADEM 335-3-4-.02(4) was removed effective July 15, 1999, however, the provision is still included in the EPA-approved SIP.

<sup>&</sup>lt;sup>9</sup> All allowable emissions rates in Table 6-3 should be construed to have 2 significant figures, consistent with ADEM 335-3-4-.05, Table 4-3.

<sup>&</sup>lt;sup>10</sup> All allowable emissions rates in Table 6-4 should be construed to have 1 significant figure, consistent with ADEM 335-3-4-.06, Table 4-4.

<sup>11</sup> The definition at ADEM 335-3-6-.24(2)(d) is located at JCDH Part 1.3.

<sup>&</sup>lt;sup>12</sup> The EPA-approved SIP excludes only 11 compounds from the definition of VOC at ADEM 335-3-6-.26(1) (JCDH 8.3.1). The SIP-approved exemptions are listed in ADEM 335-3-1-.02(1)(gggg)(JCDH Part 1.3) as numbered exemptions 1-10 and 20).

<sup>&</sup>lt;sup>13</sup> The EPA-approved SIP requires a disposal system in conjunction with equipment required by ADEM 335-3-6-.26(2)(c)1.(i) (JCDFI 8.3.2(c)(1)(i)).

<sup>&</sup>lt;sup>14</sup> ADEM 335-3-6-33(5)(n) (JCDH 8.12.5(n)) is not included in the approved SIP.

<sup>&</sup>lt;sup>15</sup> Federally enforceable testing provisions for perchloroethylene dry cleaning systems are located at ADEM 335-3-6-.37(5) and federally enforceable testing provisions for capture efficiency are located at ADEM 335-3-6-.37(13).

JCDH Citation	State Citation	Title/Subject
D-+820	Section 335-3-6-41	Leaks from Gasoline Tank Trucks and Vapor Collection
Part 8.20, except 8.20.8	Section 333-3-641	Systems
Part 8.22	Section 335-3-64316	Graphic Arts
Part 8.23	Section 335-3-644	Petroleum Liquid Storage in External Floating Roof Tanks
Part 8.24	Section 335-3-645	Large Petroleum Dry Cleaners
Part 8.26	Section 335-3-647	Leaks from Coke by-Product Recovery Plant Equipment
Part 8.27	Section 335-3-648	Emissions from Coke by-Product Recovery Plant Coke Oven Gas Bleeder
Part 8.28	Section 335-3-649 <sup>17</sup>	Manufacture of Laminated Countertops
Part 8.29	Section 335-3-650	Paint Manufacture
Part 8.23 <sup>18</sup>	Section 335-3-653	List of EPA Approved and Equivalent Test Methods and Procedures for the Purpose of Determining VOC Emissions
Chapter 9	Chapter No. 335-3-7	Control of Carbon Monoxide Emissions
Part 9.1	Section 335-3-701	Metals Productions
Part 9.2	Section 335-3-702	Petroleum Processes
Chapter 10	Chapter No. 335-3-8	Control of Nitrogen Oxides Emissions
Part 10.1	Section 335-3-801	Standards for Portland Cement Kilns
Part 10.2	Section 335-3-802	Nitric Acid Manufacturing
Part 10.3	Section 335-3-803	NOx Emissions from Electric Utility Generating Units
Part 10.4	Section 335-3-804	Standards for Stationary Reciprocating Internal Combustion Engines
Part 10.5	Section 335-3-80519	New Combustion Sources
D . 10.7.1 1.10.20	Sections 335-3-807	TD NO. Amount Trading Dragger
Parts 10.7 through 10.38	through 335-3-838	TR NO <sub>x</sub> Annual Trading Program
Parts 10.39 through 10.70	Sections 335-3-839 through 335-3-870	TR NO <sub>X</sub> Ozone Season Trading Program
Chapter 11	Chapter No. 335-3-9	Control of Emissions from Motor Vehicles
Part 11.1	Section 335-3-901	Visible Emission Restriction for Motor Vehicles
Part 11.2	Section 335-3-902	Ignition System and Engine Speed
Part 11.3	Section 335-3-903	Crankcase Ventilation Systems
Part 11.4	Section 335-3-904	Exhaust Emission Control Systems
Part 11.5	Section 335-3-905	Evaporative Loss Control Systems
Part 11.6	Section 335-3-906	Other Prohibited Acts
Part 11.7	Section 335-3-907	Effective Date
Chapter 17	Chapter No. 335-3-15	Synthetic Minor Operating Permits
Part 17.1	Section 335-3-1501 <sup>20</sup>	Definitions
Part 17.2, except 17.2.8(h)(7)	Section 335-3-1502 <sup>21</sup>	General Provisions
Part 17.3	Section 335-3-1503	Applicability
Part 17.4 <sup>22</sup>	Section 335-3-1504	Synthetic Minor Operating Permit Requirements
Part 17.5, except 17.5.2	Section 335-3-1505	Public Participation
Chapter 19	Chapter No. 335-3-17	Conformity of Federal Actions to State Implementation Plans
Part 19.1	Section 335-3-17.01 <sup>23</sup>	Transportation Conformity
Part 19.2	Section 335-3-1702	General Conformity

<sup>16</sup> The following provisions are not included in the EPA-approved SIP: the last 4 sentences of ADEM 335-3-6-.43(1)(c) (JCDH 8.22.(c)), provision ADEM 335-3-6-.43(1)(f) (JCDH 8.22.1(f)) and all provisions of ADEM 335-3-6-.43(5) & (6) (JCDH 8.22.5 and 8.22.6).

<sup>17</sup> Current ADEM 335-6-.49(4) & (5) (JCDH 8.28.4 and 8.28.5) are not included in the EPA-approved SIP. The SIP-approved version of ADEM 335-6-.49(4) (JCDH 8.28.4) is "Compliance with this Rule shall be demonstrated via certification by the adhesive manufacturer as to the composition of the adhesive, if supported by actual batch formulation records. Sufficient data to determine as-applied formulation is different from the as-purchased adhesive."

<sup>&</sup>lt;sup>18</sup> Test Methods 204, 204A-204F are not included in the APR-approved SIP.

<sup>&</sup>lt;sup>19</sup> ADEM 335-3-8-.05 was approved into the SIP as ADEM 335-3-8-.14 but was renumbered when CAIR provisions were removed.

<sup>&</sup>lt;sup>20</sup> Only the first sentence of ADEM 335-3-15-.01(g) is approved into the SIP. JCDH does not include the unapproved language.

<sup>&</sup>lt;sup>21</sup> ADEM 335-3-15-.02(10) is not included in the EPA-approved SIP. JCDH does not include the unapproved provision.

<sup>&</sup>lt;sup>22</sup> JCDH Part 17.4 does not include the federally enforceable provisions of ADEM 335-3-15-.04(1)(g) and (3)(c).

<sup>&</sup>lt;sup>23</sup> The reference to July 1, 2012 in ADEM 335-3-14-.01 and JCDH Part 19.1.1 has not been approved into the SIP.