



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: REHAU AUTO LLC &
REHAU CONSTRUCTION LLC

FACILITY NAME: REHAU

FACILITY/PERMIT NO.: 702-0021

LOCATION: CULLMAN, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

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Effective Date: September 5, 2020

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Operating Permit Summary No. 3

Emission Unit(s):

COATING OF POLYMER AUTOMOTIVE PARTS LINE
WITH NATURAL GAS FIRED THERMAL OXIDIZER
WITH PROPANE BACKUP

**Designation No(s). in Application:
Description:**

COATING OF POLYMER AUTOMOTIVE PARTS LINE
WITH NATURAL GAS FIRED THERMAL OXIDIZER
WITH PROPANE BACKUP

Permitted Operating Schedule:

24 hr/day x 365 days/yr. = 8760 hr/yr.

Type and quantity of fuel used:

Primary: None
Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	245 TONS PER 12 MONTHS	PSD SYTHETIC MINOR
HAPs	EMISSIONS VENTED TO A 95% EFFICIENT CONTROL DEVICE	MACT-PPPP

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits."	ADEM Admin. Code R. 335-3-16-.03
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06 (93), "National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products Operations as an "Existing Source".	ADEM Admin. Code R. 335-3-11-.06(93)
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 245 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-14-.04(8)
2. This unit is limited to the use of Natural Gas or Propane only as a fuel to fire the burner. Any plans to change the type of burner fuel must be received prior approval from this office.	ADEM Admin. Code R. 335-3-1-.04
3. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart P §63.4490. This existing plastic parts coating line will show compliance with the standard to include 63.4490(b)(3). This regulation requires for each existing TPO coating affected source, to limit organic HAP emissions to no more than 0.26 lb organic HAP emitted per lb coating solids used during each 12-month compliance period among other requirements. This source shall also comply with the work practice standards listed in 63.4493(b)(1)-(5).	ADEM Admin. Code R. 335-3-11-.06(93)
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	

1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.
2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code R. 335-3-1-04

ADEM Admin. Code R. 335-3-11-.06(93)

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements in addition to those listed below.
2. The temperature data required in Proviso 5.5 must be instantaneously recorded on a chart or other permanent record form which shows continuous temperature readings of the combustion chamber temperature.
The thermal oxidizer must have an audible alarm or easily detectable signal which will provide a warning when the combustion chamber temperature decreases to less than the established minimum operational temperature. The origin and detectability of the audible or other signal shall be such that it can be readily heard or detected by the operator or another person who will immediately determine the cause and take appropriate action to correct any problem and/or record the malfunction/reason. These shall be recorded as specified in Proviso 5.6.
3. This source shall comply with the compliance and monitoring requirements set forth in 40 CFR §63.4560(b), §63.4561, §63.4563, §63.4564, §63.4565, §63.4566, §63.4567, and §63.4568, among other requirements.
40 CFR §63.4563 requires:
In order to demonstrate compliance with 40 CFR Part 63, Subpart PPPP, the calculations listed in §63.4563 (a) through (g) must be performed on a monthly basis

ADEM Admin. Code R. 335-3-1-04

ADEM Admin. Code R. 335-3-11-.06(93)

using data from the previous 12 months of operation.

Section 5--Recordkeeping and Reporting Requirements

1. This source shall comply with the recordkeeping requirements set forth in 40 CFR §63.4530(a), (b), (c), (d), (e), (f), (g), (h), (i) among other requirements. The facility must keep the following records:
 - (a) A copy of each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (b) A current copy of information used to determine the mass fraction of organic HAP and density for HAP containing material, and the mass fraction of coating solids for each coating.
 - (c) For each compliance period, the information required in §63.4530 (c)(1-4).
 - (d) A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the source, purchase records may be used for each material rather than a record of the mass used.
 - (e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
 - (f) A record of the mass fraction of coating solids for each coating used during each compliance period.
 - (g) If the facility uses an allowance in Equation 1 of §63.4551 for organic HAP contained in waste materials sent to, or designated for, shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4551 (e)(4), the records listed in §63.4530 (g)(1), (2), and (3) shall be kept.
 - (h) Records of the date, time, and duration of each deviation.
 - (i) The following records concerning the use of the add-on control device:
 - (1) Deviation records of startups, shutdowns, and malfunctions.
 - (2) Records in §63.6(e)(3)(iii) of startups, shutdowns, and malfunctions.
 - (3) Records to show continuous compliance with the operating limit in Table 1 of §63.

ADEM Admin. Code R. 335-3-11-.06(93)

(4) Records to show each capture system meets the PTE requirements.

(5) Records to show each capture system that does not meet the PTE requirements, meets other requirements.

(6) Records of the add-on control device performance test and the coating conditions during this test.

(7) Records of the data and calculations used to establish the operating limits during this test.

(8) A record of the work practice plan and implementation data.

2. This source shall comply with the recordkeeping requirements set forth in 40 CFR §63.4531(a), (b), (c) among other requirements.

40 CFR §63.4531(a), (b), and (c) requires that:

(a) Records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The records may be kept off-site for the remaining 3 years.

3. In accordance with 40 CFR Part 63, Subpart PPPP the facility shall submit a semi-annual compliance report containing the information required in §63.4520 (a)(3) (b), and (c) among other requirements.

Each semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. The report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

If there were no deviations from the emission limitations, the semiannual compliance report must

ADEM Admin. Code R. 335-3-11-.06(93)

ADEM Admin. Code R. 335-3-11-.06(93)

include a statement to that effect.

If the compliant material option is used, and there was a deviation, the semiannual compliance report must contain the information listed in §63.4520 (a)(5)(i) through (iv).

If the emission rate without add-on controls option is used, and there was a deviation from the applicable emission limit, the semiannual compliance report must contain the information listed in §64.4520 (a)(6)(i) through (iii).

If the emission rate with add-on controls option is used, and there was a deviation from the applicable emission limit, the semiannual compliance report must contain the information listed in §64.4520 (a)(7)(i) through (xiv).

4. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:
 - (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
 - (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
 - (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
 - (d) Compliance with VOC limits shall be based upon

ADEM Admin. Code R. 335-3-1-.04

monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

- (e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code R. 335-3-1-.04

5. The minimum operational temperature of the combustion chamber of the common thermal oxidizer shall be determined by test. Following testing, the temperature corresponding to an acceptable VOC destruction efficiency shall be established as the minimum operation temperature of the combustion chamber. If future testing is required by ADEM, new parameters shall be established. The records in Proviso 4.2 must be maintained for at least five years following the data recording. The minimum operational temperature shall be determined on a three hour rolling average.

ADEM Admin. Code R. 335-3-1-.04

6. The time, duration, cause(s), and the action(s) taken for any operating temperature less than the established minimum shall be recorded in a form suitable for inspection. These records shall be maintained for at least five years. For periods when the temperature is more than 50 °F below the minimum operating

ADEM Admin. Code R. 335-3-1-.04

temperature, VOCs will be calculated as if there was no (0%) capture and destruction of VOCs in the thermal oxidizer.

7. When any bypassing of the thermal oxidizer occurs, the time, date, duration, estimated VOC emissions, and equipment process(es) bypassed will be recorded. The record must be maintained for at least five years following the data recording. ADEM Admin. Code R. 335-3-1-04
8. Records will be maintained of any malfunction or non-operation of the common thermal oxidizer, which results in an increase in the VOC emissions from any or all equipment. The record must be maintained for at least five years following the data recording. ADEM Admin. Code R. 335-3-1-04
9. By the fifteenth of the month following the end of each calendar quarter, a written report for the previous three months shall be submitted to the Air Division. The report shall provide the following information, as applicable. ADEM Admin. Code R. 335-3-1-04
 - (a) The quantity of the solvents of VOCs in the coatings applied by each process operation.
 - (b) The VOCs bypassed by each process operation.
 - (c) The VOCs vented to the thermal oxidizer by each process operation.
 - (d) The estimated averaged destruction efficiency of the thermal oxidizer.
 - (e) The VOCs released or exhausted into the atmosphere by the thermal oxidizer.
 - (f) The overall reduction of the VOC emissions from the process equipment.
 - (g) The time and date of any and all periods of coatings operations where the temperature of the thermal oxidizer is more than 50 °F below the average temperature recorded during the most recent performance test which complied with the required overall VOC emission reduction.
 - (h) The cumulative or total quantity of VOCs

released or exhausted into the atmosphere by the process equipment and their oxidizer control unit during the applicable month and previous eleven months.

- (i) The records detailed in Proviso No. 5.4.

Operating Permit Summary No. 5

Emission Unit(s):

PIPE ID MARKING / PRINTING OPERATION

Designation No(s). in Application:

Description:

PIPE ID MARKING / PRINTING OPERATION

Permitted Operating Schedule:

24 hr/day x 365 days/yr. = 8760 hr/yr.

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	245 TONS PER 12 MONTHS	PSD SYTHETIC MINOR

Unit Specific Provisos

Federally Enforceable Provisos

Regulations

Section 1--Applicability

1. This source is subject to a PSD synthetic minor emission limitation.

ADEM Admin. Code R. 335-3-14-.04

Section 2--Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from the entire facility shall not exceed a total of 245 tons per year (TPY) in any consecutive rolling 12-month period.

ADEM Admin. Code R. 335-3-14-.04(8)

Section 3--Compliance and Performance Test Methods and Procedures

1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code R. 335-3-1-.04

Section 4--Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

Section 5--Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:
 - (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
 - (b) The percent by weight of VOCs, water, solids,

ADEM Admin. Code R. 335-3-1-.04

VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with VOC limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.
- (i) By the fifteenth of the month following the end of each calendar quarter, a written report for the previous three months shall be submitted to the Air Division. The report shall provide the above information, as applicable.

Operating Permit Summary No. 10

Emission Unit(s):

20.9 MMBTU/HR NATURAL GAS FIRED BOILER WITH
PROPANE BACKUP

Designation No(s). in Application:

BOILER NO. 1

Description:

20.9 MMBTU/HR NATURAL GAS FIRED BOILER WITH
PROPANE BACKUP

Permitted Operating Schedule:

24 hr/day x 365 days/yr. = 8760 hr/yr.

Type and quantity of fuel used:

Primary: NATURAL GAS

Secondary: PROPANE

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
Particulate	$E=1.38H^{-0.44}$	SIP
Opacity	20% as determined by a 6 minute average	SIP
	Recordkeeping	NSPS
SO ₂	4.0 pounds per MMBtu heat input	SIP

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This unit is subject to the sulfur dioxide emission rate limits for steam generating units.	ADEM Admin. Code R. 335-3-5-.01
2. This unit is subject to the particulate emission rate limits for fuel burning equipment.	ADEM Admin. Code R. 335-3-4-.03
3. This unit is subject to the opacity emission rate limits.	ADEM Admin. Code R. 335-3-4-.01
4. This unit is subject the Standards of performance for New Stationary Sources; Small Industrial-Commercial-Instituional Steam Generating Units, 40 CFR Part 60, Subpart Dc.	ADEM Admin. Code R. 335-3-10-.02
<i>Section 2--Emission Standards</i>	
1. The sulfur dioxide emission rate shall not exceed 4 pounds per million Btu heat input to the steam generating unit.	ADEM Admin. Code R. 335-3-5-.01
2. The particulate emission rate shall not exceed $E=1.38H^{-0.44}$	ADEM Admin. Code R. 335-3-4-.03
3. This unit shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.	ADEM Admin. Code R. 335-3-4-.01

Section 3--Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A shall be used in the determination of the opacity of the stack emissions.
2. Method 5 or 5a as defined in 40 CFR 60, Appendix A shall be used in the determination of particulate emissions from the stack.
3. Method 6 as defined in 40 CFR 60, Appendix A shall be used in the determination of sulfur dioxide emissions from the stack.

ADEM Admin. Code R. 335-3-1-.05

ADEM Admin. Code R. 335-3-1-.05

ADEM Admin. Code R. 335-3-1-.05

Section 4--Emission Monitoring

Section 5--Recordkeeping and Reporting Requirements

1. Records of monthly fuel usage must be kept in a permanent form suitable for inspection. The records shall be retained for at least five years from the date of generation and available upon request.

ADEM Admin. Code R. 335-3-10-.02

Operating Permit Summary No. 11

Emission Unit(s):

10.5 MMBTU/HR NATURAL GAS FIRED BOILER WITH
PROPANE BACKUP
BOILER NO. 2

Designation No(s). in Application:

Description:

10.5 MMBTU/HR NATURAL GAS FIRED BOILER WITH
PROPANE BACKUP

Permitted Operating Schedule:

24 hr/day x 365 days/yr. = 8760 hr/yr.

Type and quantity of fuel used:

Primary: NATURAL GAS

Secondary: PROPANE

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
Particulate	$E=1.38H^{0.44}$	SIP
Opacity	20% as determined by a 6 minute average	SIP
	Recordkeeping	NSPS
SO ₂	4.0 pounds per MMBtu heat input	SIP

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This unit is subject to the sulfur dioxide emission rate limits for steam generating units.	ADEM Admin. Code R. 335-3-5-01
2. This unit is subject to the particulate emission rate limits for fuel burning equipment.	ADEM Admin. Code R. 335-3-4-03
3. This unit is subject to the opacity emission rate limits.	ADEM Admin. Code R. 335-3-4-01
4. This unit is subject the Standards of performance for New Stationary Sources; Small Industrial-Commercial-Institutaional Steam Generating Units, 40 CFR Part 60, Subpart D _c .	ADEM Admin. Code R. 335-3-10-02
<i>Section 2--Emission Standards</i>	
1. The sulfur dioxide emission rate shall not exceed 4 pounds per million Btu heat input to the steam generating unit.	ADEM Admin. Code R. 335-3-5-01
2. The particulate emission rate shall not exceed $E=1.38H^{0.44}$	ADEM Admin. Code R. 335-3-4-03
3. This unit shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.	ADEM Admin. Code R. 335-3-4-01

Section 3--Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A shall be used in the determination of the opacity of the stack emissions.
2. Method 5 or 5a as defined in 40 CFR 60, Appendix A shall be used in the determination of particulate emissions from the stack.
3. Method 6 as defined in 40 CFR 60, Appendix A shall be used in the determination of sulfur dioxide emissions from the stack.

ADEM Admin. Code R. 335-3-1-.05

ADEM Admin. Code R. 335-3-1-.05

ADEM Admin. Code R. 335-3-1-.05

Section 4--Emission Monitoring

Section 5--Recordkeeping and Reporting Requirements

1. Records of monthly fuel usage must be kept in a permanent form suitable for inspection. The records shall be retained for at least five years from the date of generation and available upon request.

ADEM Admin. Code R. 335-3-10-.02