

NOTICE OF PUBLIC COMMENT PERIOD REGARDING MODIFICATION OF A MAJOR
SOURCE OPERATING PERMIT FOR A PLUMBING FIXTURE MANUFACTURING
FACILITY IN HUNTSVILLE, ALABAMA

Kohler Company has applied to the Natural Resources Division for modification of the Major Source Operating Permit currently held by their plumbing manufacturing facility located at 176 Cochran Road in Huntsville, AL. Modification of the Permit will incorporate the requirements of an air permit issued for the incorporation of additional sheet molding compound (SMC) manufacturing and closed compression molding capacity, thermal oxidation on SMC manufacturing lines, robotic trimming of plumbing fixtures with a central dust collection system, three (3) natural gas-fired boilers, and two (2) diesel emergency generator engines.

The manufacturing process at the Kohler facility involves preparation of a fiberglass reinforced composite referred to as Sheet Molding Compound (SMC) or Bulk Molding Compound (BMC). SMC and BMC are essentially similar fiberglass reinforced composites, with SMC being formed as a continuous sheet in an SMC machine, and BMC being formed as a slug in batch mixing vessels. The SMC or BMC is then molded and cured into fiberglass plumbing fixtures in hydraulic presses. This is a closed molding operation, i.e. the SMC (or BMC) is not exposed to the air while curing in the press mold. Styrene, a component of the resin used in producing the composites, is the principal compound emitted during the manufacturing process. Styrene is both a Volatile Organic Compound (VOC) and a Hazardous Air Pollutant (HAP) and is consequently a regulated air pollutant under the Clean Air Act. The facility also performs surface coating of plastic parts and products in touch-up, repair, and assembly of manufactured plumbing fixtures. Emissions of VOC and HAP are also associated with the surface coating operations. Natural gas-fired boilers provide process heat to the molds in the hydraulic presses.

The facility is subject to federal Maximum Achievable Control Technology (MACT) requirements applicable to fiberglass reinforced plastic product manufacturing operations, surface coating of plastic parts and products, and natural gas-fired industrial boilers. A facility-wide numeric VOC emissions limitation remains unchanged as a permit requirement. Monitoring of material usage, record-keeping, reporting and compliance certification requirements serve to demonstrate ongoing compliance.

The Division of Natural Resources is proposing to modify the existing Major Source Operating Permit held by Kohler Company. A public comment period, which begins upon publication of this Public Notice, has been established in order to give interested individuals an opportunity to provide additional information or comments. If significant comments are received, a hearing may be scheduled.

Information regarding emissions, applicable air pollution control regulations, and emission controls, as well as copies of the application and the Draft Permit are available at the Huntsville Natural Resources office or by contacting Natural Resources at (256) 427-5750. Any person wishing to provide written comments may do so by writing S. Cardno, Natural Resources Division, City of Huntsville, P.O. Box 308, Huntsville, Alabama, 35804. All comments must be received by 5:00 P.M., January 6, 2020, or thirty (30) days from publication of this Notice, whichever is later.

The scope of this public comment period is limited to air pollution and its effects. Comments relative to site selection or economic and social impacts are not within the scope of this public comment period.