

NOTICE OF PUBLIC COMMENT PERIOD REGARDING MODIFICATION OF A
SYNTHETIC MINOR OPERATING PERMIT FOR AN EXISTING ROBOTIC SURFACE
COATING APPLICATION SYSTEM INTEGRATION FACILITY IN HUNTSVILLE,
ALABAMA

Pratt & Whitney – Automation (PWA) has applied to the Division of Natural Resources and Environmental Management (DNREM) for modification of a Synthetic Minor Operating Permit (SMOP) for their existing robotic surface coating application system integration facility located on Highway 20 West in Huntsville, Alabama. The facility integrates robotic surface coating spray application systems, which perform precision application of paints, primers, and other surface coatings. The facility currently has installed nine (9) robotic paint spray booths. These booths are primarily used to test and optimize the performance of the robotic spray equipment. A limited amount of surface coating of military aircraft components is done at the facility on a contract basis.

Emissions of Volatile Organic Compounds (VOCs) result from the surface coating operations. Some of these VOCs are also subject to regulation as Hazardous Air Pollutants (HAPs). Historically, emissions of VOCs and HAPs from the PWA facility have been very low, due to the small volumes of paints and primers used. During 2018, PWA installed a Regenerative Thermal Oxidizer (RTO) to maintain compliance with emissions limitations imposed by the SMOP during a period of increased production. Production levels have since returned to previous levels and emissions have decreased significantly prompting PWA to apply for a modification of their existing SMOP to discontinue use of the RTO as it is no longer needed to maintain compliance with emissions limitations. As drafted, the modified SMOP will include provisions to allow PWA to operate the RTO intermittently should conditions and production levels require to maintain compliance with emissions limitations. PWA will be required to notify DNREM when the RTO is either placed back in operation or removed from service. There are no changes to the VOCs and HAPs emission limitations imposed by the current SMOP held by the facility. Monitoring of material usage, record-keeping, and reporting requirements still serve to demonstrate compliance with the imposed emissions limitations.

A public comment period 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 and pollution controls is available at the DNREM office or by phone at (256) 427-5750. Any person wishing to provide written comments may do so by writing Scott Cardno, Natural Resources Division, City of Huntsville, P.O. Box 308, Huntsville, AL 35804. All comments must be received by 5:00 P.M., January 28, 2021, or fifteen (15) 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.