



CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

MAJOR SOURCE OPERATING PERMIT

Issued to: Mazda Toyota Manufacturing, USA, Inc. (MTMUS)

Location: 9000 Greenbrier Parkway, NW

Huntsville, Alabama 35756

Permit Number(s) Description of Source(s)

7-09-P391-Z001 Manufacturing of Automobiles (MTMUS JV Facility):
Stamping Operations (Unit 100)
Welding Operations (Unit 150)
Surface Coating Operations (Unit 200)
Assembly of Automobiles (Unit 300)
Miscellaneous Natural Gas-Fired Combustion (Unit 1500)
Gasoline Storage w/ Stage I Vapor Recovery (Unit 1600-5)
Windshield Washer Fluid Storage (Unit 1600-4)
Two (2) Natural Gas-Fired Emergency Generator Engines (Units 1700-3a
& 1700-3b))
Three (3) Diesel-Fired Emergency Generator Engines (Units 1700-1a, 1700-
1b, & 1700-1c)
Two (2) Diesel-Fired Emergency Fire Pump Engines (Unit 1700-2)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) 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 ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local 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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Date of Issuance: DRAFT

Expiration Date: DRAFT

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

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Mazda Toyota Manufacturing, USA, Inc. (MTMUS) – JV Facility
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

- (A) The permittee shall comply with all conditions of COHRAR. Noncompliance with this Permit will constitute a violation of the Clean Air Act of 1990, and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee. [COHRAR §§ 3.1.4; 3.9.5(h)]
- (B) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this Permit would have required halting or reducing the permitted activity. [COHRAR § 3.9.5(i)]

2. Additional Rules and Regulations

This Permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules. [COHRAR § 3.1.4]

3. Schedule of Compliance

- (A) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance. [COHRAR §§ 3.1.4; 3.9.5(r)]
- (B) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit. [COHRAR §§ 3.1.4; 3.9.5(r)]

4. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner 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 emission of air contaminants shall be established. [COHRAR § 1.12]

5. Circumvention

The permittee shall not 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 contaminant which would otherwise violate this Permit or COHRAR. [COHRAR § 1.15]

6. Opacity Limitations

- (A) The permittee shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant of a shade or density darker than that designated as twenty percent (20%) opacity. [COHRAR § 6.1.1]
- (B) Compliance with opacity standards shall be determined by conducting observations in accordance with Reference Method 9 in 40 CFR Part 60, Appendix A. [COHRAR § 6.1.2]

7. Particulate Matter Emissions Limitations

Hourly particulate matter emissions from any source within the facility shall not exceed the amount calculated using the following equations: [COHRAR § 6.4.1]

$$E = 3.59P^{0.62} \quad \text{for } P < 30 \text{ tons per hour}$$
$$E = 17.31P^{0.16} \quad \text{for } P \geq 30 \text{ tons per hour}$$

where E = Particulate emission rate in pounds per hour
P = Process weight throughput in tons per hour

I.B. General Monitoring, Inspection, Recordkeeping, and Monitoring Requirements

1. Monitoring, Records, and Reporting

- (A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR. [COHRAR § 1.9.1]
- (B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled and submitted on forms provided by the Director or in formats approved by the Director. [COHRAR § 1.9.2]
- (C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61 and Part 63 of Title 40 of the Code of Federal

Regulations, as the same may be amended or revised, shall be employed. [COHRAR §§ 1.10.1; 1.10.2]

2. Inspection and Entry

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management to:

- (A) enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this Permit; [COHRAR §§ 1.8; 3.9.5(q)(1)]
- (B) review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this Permit; [COHRAR §§ 1.8; 1.9, 3.9.5(q)(2)]
- (C) inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this Permit; [COHRAR §§ 1.8; 3.9.5(q)(3)]
- (D) sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this Permit or other applicable requirements. [COHRAR §§ 1.10.3; 3.9.5(q)(4)]

3. Record Keeping Requirements

All monitoring records maintained pursuant to this Permit shall include the following information, as appropriate: [COHRAR § 3.9.5(d)(1)]

- (A) the date, time and location of all sampling or measurements;
- (B) the date(s) analyses were performed;
- (C) the company or entity that performed the analyses;
- (D) the analytical techniques or methods used;
- (E) the results of all analyses; and
- (F) the operating conditions that existed at the time of sampling or measurement.

4. Records Retention

Records of all required monitoring data and support information shall be retained by the permittee for a period of at least five (5) years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and

maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this Permit. [COHRAR § 3.9.5(d)(2)]

5. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it. [COHRAR § 3.1.7]

6. Semi-Annual Monitoring Report Submission

On a semi-annual basis, the permittee shall submit monitoring reports to the Department which contain the results of all monitoring specifically required by Part III of this Permit. All instances of deviations from permit requirements of this Permit shall be clearly identified in the monitoring reports and must be certified by a responsible official in accordance with Part I.B.7. of this Permit. These monitoring reports shall be submitted not later than May 1 and November 1 of each year. Submittal of the monitoring report due no later than May 1 may coincide with submittal of the Annual Compliance Certification required by Part I.B.8. of this Permit and the payment of Annual Emissions Fees in accordance with Part I.C. of this Permit. The report due on May 1 shall cover the monitoring period from October 1 of the previous year through March 31 of the year of submission. The report due on November 1 shall cover the monitoring period from April 1 through September 30. [COHRAR § 3.9.5(e)(1)]

7. Certification of Truth, Accuracy, and Completeness

Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this Permit shall contain certification by a responsible official of truth, accuracy, and completeness. This 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. [COHRAR §§ 3.9.4(a); 3.9.5(p)]

8. Compliance Certification

A compliance certification shall be submitted annually at the time of annual emissions fees payments made pursuant to I.C of this Permit. 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. [COHRAR § 3.9.5(t)]

(A) The compliance certification shall include the following:

- (1) the identification of each term or condition of this Permit that is the basis of the certification;
- (2) the compliance status;

- (3) whether compliance has been continuous or intermittent; and
 - (4) the method(s) used for determining the compliance status of the source, currently and over the reporting period, consistent with COHRAR §§ 3.9.5(c) and 3.9.5(d) (Monitoring and Record Keeping Requirements), and the specific terms included in Part III of this Permit.
- (B) The compliance certification shall be submitted to the Department and to the Environmental Protection Agency (EPA) at the following addresses:

City of Huntsville
Division of Natural Resources & Environmental Management
P. O. Box 308
Huntsville, AL 35804

and to:

Air and EPCRA Enforcement Branch
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

9. Non-Compliance Reporting

The permittee shall report deviations from requirements of this Permit within two (2) working days of such deviations, unless a shorter reporting time is specified in this Permit (e.g. for equipment malfunction reporting pursuant to I.B.10(B) of this Permit). The report shall include the probable cause of the deviation and describe corrective actions or preventive measures that were taken. [COHRAR § 3.9.5(e)(2)]

10. Equipment Maintenance or Breakdown

- (A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating. [COHRAR § 1.12.2]
- (B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected. [COHRAR § 1.12.3]

11. Progress Reports

If any air pollution source owned or operated by the permittee is not in compliance with the emissions limitations, standards and work practices listed or referenced within this permit, the permittee shall submit a progress report for that air pollution source. The first schedule of compliance shall be submitted within three (3) months of the date the permittee or Department determines that the air pollution source is not in compliance. Subsequent reports shall be submitted every sixth month following the initial report. The progress reports shall contain the following: [COHRAR § 3.9.5(s)]

- (A) the dates for achieving the activities, milestone, or compliance required in the schedule of compliance, and/or dates when such activities, milestones or compliance were achieved; and
- (B) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

I.C. Fee Payments

1. Annual Emissions Fees

On an annual basis the permittee shall:

- (A) pay emissions fees based on actual emissions of each regulated air pollutant, except carbon monoxide (CO), emitted during the preceding calendar year; [COHRAR § 3.7.4(c)]
- (B) determine emissions fees payments at the rate of \$25 per ton of each regulated air pollutant, plus the difference in the CPI (Consumer Price Index) of the year the fees are assessed and the CPI for 1989; [COHRAR § 3.7.4(c)]
- (C) make payment of annual emissions fees on or before May 1 of each calendar year; [COHRAR § 3.7.5(a)]
- (D) pay a late fee of three percent (3%) of the original fee per month or fraction thereof if fees are not paid within thirty (30) days of the due date; and [COHRAR § 3.7.5(d)]
- (E) make fees and remittances payable to the City of Huntsville. [COHRAR § 3.7.5(e)]
- (F) All fees paid pursuant to COHRAR Part 3.7 shall be non-refundable. [COHRAR § 3.7.5(d)]

2. Fee Payments

For this Permit to remain effective, all applicable fees must be paid in accordance with

COHRAR Parts 3.6 and 3.7. [COHRAR § 3.9.5(m)]

3. Conflict With State Law

In the event there is a conflict between State law or the regulations promulgated thereto and the fee schedule included in I.C.1. and I.C.2. of this Permit, then the fee schedule established under State law shall take precedence. [Ala. Code 1975 § 22-28-23; COHRAR §§ 3.6.8; 3.7.4(g)]

I.D. Permit Modification, Renewal, and Termination

1. 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 COHRAR § 3.9.11(a)(1)(v). [COHRAR § 3.1.5]

2. New Air Pollution Sources

- (A) 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. [COHRAR § 3.1.2(a)]
- (B) Actual construction of a major modification, as defined in COHRAR Part 3.5 (Prevention of Significant Deterioration), shall not begin prior to issuance of an Air Permit in accordance with COHRAR Part 3.5, or modification of this Permit in accordance with COHRAR § 3.1.2(h)(5). [COHRAR § 3.5.1]
- (C) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3. [COHRAR § 3.2.1]

3. Alternative Operating Scenarios

For those alternative operating scenarios identified in Part III of this Permit as acceptable, the permittee shall: [COHRAR § 3.9.5(o)]

- (A) Record the change from one operating scenario to another in a log at the permitted facility. The recording of the change shall be made contemporaneously with the change, and the log shall contain the scenario under which the facility is currently operating.
- (B) Ensure that terms and conditions of each alternative operating scenario meet all the requirements of this permit, as well as COHRAR Part 3.9.

4. Economic Incentives

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. [COHRAR § 3.9.5(n)]

5. Submittal of Information

The permittee must submit to the Department, within thirty (30) days or 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 this Permit or to determine compliance with this Permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this Permit. [COHRAR § 3.9.5(l)]

6. Renewals

- (A) This Permit is issued for a fixed period of five (5) years. An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this Permit. [COHRAR §§ 3.9.5(b); 3.9.2(c)]
- (B) Authorization to operate the permitted facility shall terminate upon the expiration of this Permit unless a timely and complete renewal application has been submitted. If a timely and complete application for renewal is submitted, but the Director fails to take action to issue or deny the renewal permit before the end of the term of this Permit, then this Permit shall not expire until the renewal permit has been issued or denied. [COHRAR § 3.9.10(b)]

7. Termination for Cause

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 planned changes or anticipated noncompliance will not stay any permit condition. [COHRAR §§ 3.2.5; 3.9.5(j)]

8. Reopening for Cause

Under any of the following circumstances, this Permit will be reopened prior to the expiration of the permit. [COHRAR § 3.9.11(e)]

- (A) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. 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.
- (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.

- (C) The Department 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.
- (D) The Administrator or the Department determines that this Permit must be revised or revoked to assure compliance with the applicable requirements.

9. Revocation for Cause

This Permit may be revoked for any of the following causes: [COHRAR § 3.2.5]

- (A) failure to comply with any condition of this Permit or COHRAR;
- (B) failure to notify the Director prior to operation of any article, machine, equipment or other contrivance subject to the requirements of COHRAR § 3.1.2(a);
- (C) 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 the Director may prescribe in accordance with COHRAR § 1.9.2;
- (D) failure to allow the Director or his authorized representative upon proper identification to:
 - (1) enter any premises, at reasonable times, where any article, machine, equipment or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;
 - (2) have access to and copy any records required to be kept by this Permit or by COHRAR;
 - (3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; or
 - (4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2.
- (E) failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility; or
- (F) for any other cause, after a hearing which establishes, in the judgement of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under

it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

10. Expiration of Air Permits

All Air Permits issued to the permittee prior to the effective date of this Permit shall expire immediately following the issuance of this Permit. [COHRAR § 3.2.6(a)]

I.E. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9. [COHRAR §§ 2.9.1, 2.9.2]

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning and Emergency. The standby plan is subject to approval by the Director. [COHRAR § 2.8.5]

I.F. Miscellaneous Provisions

1. Property Rights

The issuance of this Permit does not convey any property rights of any sort, or any exclusive privilege. [COHRAR § 3.9.5(k)]

2. Severability

The provisions of this Permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this Permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this Permit but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this Permit that shall be directly involved in the controversy in which such judgment shall have been rendered. [COHRAR § 3.9.5(g)]

3. Authority of Department

Nothing in this Permit or conditions thereto shall negate any authority granted to the

Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Ala. Code (1975)]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) CONDITIONS

II.A. Objectionable Odors

This Permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR § 6.7. [COHRAR § 6.7]

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE CONDITIONS

This facility was initially issued permits to construct and operate pursuant to the requirements of Part 3.5 of the COHRAR (Prevention of Significant Deterioration (PSD) Permitting). In addition to the Mazda Toyota Manufacturing US (MTMUS) automobile assembly plant (“MTMUS” or “JV Facility”), the initial permit application and air quality modeling included the On-Site Partners (OSPs) located on the MTMUS campus. Consequently, any modification of the JV Facility must be viewed in conjunction with any other possible modifications on the MTMUS campus for purposes of determining PSD applicability. [COHRAR § 3.5.1]

III.A. Facility-Wide Requirements

1. Emission Limitations

- (A) Plant-wide emissions of Volatile Organic Compounds (VOCs) from the JV Facility shall not exceed 1,424 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (B) The stack(s) associated with each source at the JV Facility shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions. [COHRAR § 3.5.4]

2. Work Practice Requirements

- (A) MTMUS must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under § 63.3090(a) through (d) or § 63.3091(a) through (d). The plan must specify practices and procedures to ensure that, at a minimum, the elements

specified in paragraphs III.A.2(A)(1) through (5) of below are implemented. [COHRAR Part 14.5, Subpart III § 63.3094]

- (1) All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
 - (2) The risk of spills of organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be minimized.
 - (3) Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
 - (4) Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
 - (5) Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
- (B) MTMUS must develop and implement a work practice plan to minimize organic HAP emissions from cleaning and from purging of equipment associated with all coating operations for which emission limits for HAPs are established. [COHRAR Part 14.5, Subpart III § 63.3094]
- (1) The plan shall, at a minimum, address each of the operations listed in III.A.2(B)(1)(a) through (h) below in which organic-HAP-containing materials are used or in which there is a potential for emission of organic HAP.
 - (a) The plan must address vehicle body wipe emissions through one or more of the techniques listed in III.A.2(B)(1)(a)(i) through (v) below, or an approved alternative.
 - (i) Use of solvent-moistened wipes.
 - (ii) Keeping solvent containers closed when not in use.
 - (iii) Keeping wipe disposal/recovery containers closed when not in use.
 - (iv) Use of tack-wipes.
 - (v) Use of solvents containing less than 1% organic HAP by weight.
 - (b) The plan must address coating line purging emissions through one or more of the techniques listed in III.A.2(B)(1)(b)(i) through (iv) below, or an approved alternative.
 - (i) Air/solvent push-out.
 - (ii) Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips).
 - (iii) Block painting to the maximum extent feasible.
 - (iv) Use of low-HAP or no-HAP solvents for purge.

- (c) The plan must address emissions from flushing of coating systems through one or more of the techniques listed in III.A.2(B)(1)(c)(i) through (iv) below, or an approved alternative.
 - (i) Keeping solvent tanks closed.
 - (ii) Recovering and recycling solvents.
 - (iii) Keeping recovered/recycled solvent tanks closed.
 - (iv) Use of low-HAP or no-HAP solvents.
- (d) The plan must address emissions from cleaning of spray booth grates through one or more of the techniques listed in III.A.2(B)(1)(d)(i) through (v) below, or an approved alternative.
 - (i) Controlled burn-off.
 - (ii) Rinsing with high-pressure water (in place).
 - (iii) Rinsing with high-pressure water (offline).
 - (iv) Use of spray-on masking or other type of liquid masking.
 - (v) Use of low-HAP or no-HAP content cleaners.
- (e) The plan must address emissions from cleaning of spray booth walls through one or more of the techniques listed in III.A.2(B)(1)(e)(i) through (v) below, or an approved alternative.
 - (i) Use of masking materials (contact paper, plastic sheet, or other similar type of material).
 - (ii) Use of spray-on masking.
 - (iii) Use of rags and manual wipes instead of spray application when cleaning walls.
 - (iv) Use of low-HAP or no-HAP content cleaners.
 - (v) Controlled access to cleaning solvents.
- (f) The plan must address emissions from cleaning of spray booth equipment through one or more of the techniques listed in III.A.2(B)(1)(f)(i) through (v) below, or an approved alternative.
 - (i) Use of covers on equipment (disposable or reusable).
 - (ii) Use of parts cleaners (off-line submersion cleaning).
 - (iii) Use of spray-on masking or other protective coatings.
 - (iv) Use of low-HAP or no-HAP content cleaners.
 - (v) Controlled access to cleaning solvents.
- (g) The plan must address emissions from cleaning of external spray booth areas through one or more of the techniques listed in III.A.2(B)(1)(g)(i) through (vi) below, or an approved alternative.
 - (i) Use of removable floor coverings (paper, foil, plastic, or similar type of material).
 - (ii) Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application.

- (iii) Use of shoe cleaners to eliminate coating track-out from spray booths.
 - (iv) Use of booties or shoe wraps.
 - (v) Use of low-HAP or no-HAP content cleaners.
 - (vi) Controlled access to cleaning solvents.
- (h) The plan must address emissions from housekeeping measures not addressed in III.A.2(B)(1)(a) through (g) above through one or more of the techniques listed in paragraphs III.A.2(B)(1)(h)(i) through (iii) below, or an approved alternative.
 - (i) Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
 - (ii) Storing new and used solvents in closed containers.
 - (iii) Transferring of solvents in a manner to minimize the risk of spills.
- (2) Notwithstanding the requirements of III.A.2(B)(1)(a) through (h) above, if the type of coatings used in any facility with surface coating operations subject to the requirements of this section are of such a nature that the need for one or more of the practices specified under III.A.2(B)(1)(a) through (h) is eliminated, then the plan may include approved alternative or equivalent measures that are applicable or necessary during cleaning of storage, conveying, and application equipment.
- (C) Revisions to the work practice plan(s) developed pursuant to the requirements of III.A.2(A) and (B) above do not constitute revisions to this Permit. Copies of the current work practice plan(s), as well as plans developed within the preceding five (5) years must be available on-site for inspection.
- (D) MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize coating materials, cleaning materials, clean-up/purge/general solvent, sealers, and adhesive usage in all operations. Coatings, solvents, and other VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, coating, and cleanup. Closed containers shall be used for the storage and disposal of cloth or other material used for VOC containing material cleanup or usage. Coatings and other fresh or spent VOC coating material will be stored in closed containers. [COHRAR § 3.5.4]
- (E) Only natural gas may be used as fuel in the combustion equipment except for the diesel-fueled emergency generator engines, diesel-fueled emergency fire pump engines, and gasoline engines. [COHRAR § 3.5.4]
- (F) The following units will be captured and directed to the Combined E-coat Exhaust (Mazda and Toyota Lines) ECOAT-TO (Unit 1500-101): E-Coat Tanks (Unit 200-T1 and Unit 200-M1) and Curing Ovens (Unit 1500-8 and Unit 1500-21). [COHRAR § 3.5.4]
- (G) The following units will be captured and directed to the Combined Sealer Oven Exhaust (Mazda and Toyota Lines) SEALER-TO (Unit 1500-102): Sealer Ovens (Unit 1500-9 and

Unit 1500-22). [COHRAR § 3.5.4]

- (H) The following units will be captured and directed to the Combined Clearcoat Booth Exhaust (Mazda and Toyota Lines) CCBOOTH-CC/TO (Unit 1500-103): Topcoat Booths Solvent-borne Clearcoat (Interior) (Unit 200-T4 and Unit 200-M3) Topcoat Booths Solvent-borne Clearcoat (Exterior) (Unit 200-T4 and Unit 200-M3). [COHRAR § 3.5.4]
- (I) The following units will be captured and directed to the Combined Topcoat Oven Exhaust (Mazda and Toyota Lines) TCOVEN-TO (Unit 1500-104): Topcoat Curing Ovens (Unit 1500-15 and Unit 1500-28). [COHRAR § 3.5.4]
- (J) The Combined E-coat Exhaust (Mazda and Toyota Lines) ECOAT-TO (Unit 1500-101), Combined Sealer Oven Exhaust (Mazda and Toyota Lines) SEALER-TO (Unit 1500-102), Combined Clearcoat Booth Exhaust (Mazda and Toyota Lines) CCBOOTH-CC/TO (Unit 1500-103), and Combined Topcoat Oven Exhaust (Mazda and Toyota Lines) TCOVEN-TO (Unit 1500-104) shall be operated at or above the temperature (three-(3)-run arithmetic average) at which compliance is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance. [COHRAR § 1.12.1, 3.5.4]
- (K) A Stage II vapor control system or On-Board Vapor Recovery system shall be installed and used on Units 300-T4 and 300-M4 during filling of the gas tank of each vehicle. [COHRAR § 3.5.4]
- (L) The dry filtration systems for units in the Painting and Assembly of Automobiles (Toyota Line and Mazda Line) shall be inspected for proper operation twice weekly. The manufacturer's suggested rates for the control equipment shall be used to determine proper control device operation. Whenever maintenance checks are out of normal operational range, corrective action to minimize emissions shall be taken within forty-eight (48) hours, followed by an additional maintenance check(s) to confirm that emissions are reduced to normal. [COHRAR §§ 1.12.1, 3.5.4]

3. Monitoring Requirements

- (A) The HAP content by weight of each HAP-containing material used shall be determined using vendor provided material safety data sheets or technical data sheets that contain a listing of individual regulated HAP ingredients expressed as a percent by weight. Should the Department request verification of formulation data, the HAP content of coatings shall be determined on a random basis using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or an alternative method approved in advance. [COHRAR §§ 1.9.1, 1.10.2, 3.5.4]
- (B) 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, or an alternative method approved in advance. Equivalent vendor data based on this method is an appropriate substitute. The VOC content of coatings may be determined by test method on a random

basis to verify formulation data and such other times as the Department may request. [COHRAR §§ 1.9.1, 1.10.2, 3.5.4]

- (C) EPA document *"Protocol for Determining Daily VOC Emission Rate of Automobile and Light Duty Truck Topcoat Operations"*, June 10, 1988, and revisions thereafter, shall be used to determine transfer efficiencies, booth/oven splits, and control efficiencies for compliance with the VOC BACT Determinations. The transfer efficiencies listed in 40 CFR 60, Subpart MM or approved by the Administrator, shall be used to determine compliance with the NSPS limits in Proviso Numbers III.D.1(M) and (N) of this permit. [COHRAR §§ 1.9.1, 1.10.2, 3.5.4]
- (D) Emissions tests to demonstrate removal and destruction efficiency for the control devices are to be conducted for VOCs (for emission points: Combined E-coat Exhaust (Mazda and Toyota Lines) ECOAT-TO (Unit 1500-101), Combined Sealer Oven Exhaust (Mazda and Toyota Lines) SEALER-TO (Unit 1500-102), Combined Clearcoat Booth Exhaust (Mazda and Toyota Lines) CCBOOTH-CC/TO (Unit 1500-103), and Combined Topcoat Oven Exhaust (Mazda and Toyota Lines) TCOVEN-TO (Unit 1500-104) using the EPA Protocol specified in proviso number III.A.3(C)), transfer efficiencies, booth splits, control efficiencies, for the coatings used in coating operations using Method 24 or 311, or equivalent methods as approved by the Department, as appropriate and other items as determined at intervals not to exceed three (3) years or if a significant model change occurs (as determined by the Department) following the date of initial compliance testing. All test reports must be submitted to the Department within thirty (30) days of completion of testing, unless an extension is granted by the Department. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25/25A, 24 or 311 as appropriate as required by the Department. [COHRAR §§ 1.9.1, 1.10.2, 3.5.4]
- (E) A continuous recorder for the emission points: Combined E-coat Exhaust (Mazda and Toyota Lines) ECOAT-TO (Unit 1500-101), Combined Sealer Oven Exhaust (Mazda and Toyota Lines) SEALER-TO (Unit 1500-102), Combined Clearcoat Booth Exhaust (Mazda and Toyota Lines) CCBOOTH-CC/TO (Unit 1500-103), and Combined Topcoat Oven Exhaust (Mazda and Toyota Lines) TCOVEN-TO (Unit 1500-104) shall be installed, calibrated, and maintained to record the combustion temperature in a permanent form suitable for inspection upon request. The records shall be retained for at least five (5) years following the date of such measurement. [COHRAR §§ 1.9.1, 3.5.4]
- (F) The minimum operational temperature of the combustion chamber of the thermal oxidizer(s) for the process equipment 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. This minimum operation temperature will be calculated on a consecutive three-(3)-hour averaging time-period. A temperature reading must normally be taken at least every five (5) minutes. The temperature data must be instantaneously recorded on a chart or other permanent record form which shows continuous temperature readings of the combustion chamber temperature. The record must be maintained for at least five (5) years following

the data recording. [COHRAR §§ 1.9.1, 1.12.1, 3.5.4]

- (G) The thermal oxidizer(s) must have 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. 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 (5) years. If the three-(3)-hour rolling average falls below the minimum operational temperature for more than 15 minutes, the facility will cease introducing bodies to each respective coating process but may finish processing bodies already coated through each respective flash-off/oven area. [COHRAR §§ 1.9.1, 1.12.1, 3.5.4]
- (H) A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer(s). The recording instrument will be located for convenient reference and be of the type which provides direct reading and recording in degrees Fahrenheit. The combustion chamber temperature of the thermal oxidizer(s) will be recorded for all system operations and the recordings will be maintained in a form suitable for inspection for a period of five (5) years. [COHRAR §§ 1.9.1, 3.5.4]
- (I) Unless noted otherwise elsewhere in this Permit, the following test methods/procedures will be utilized when conducting any stack testing required by this Permit or the Department: [COHRAR §§ 1.9.1, 1.10, 3.5.4]
 - (1) Method 18 or 25/25A, as determined by the Department prior to testing, as defined in 40 CFR 60, Appendix A, or equivalent methods as approved by the Department, shall be used in the determination of volatile organic compound (VOC) emissions from the stack.
 - (2) Method 10, or equivalent method as approved by the Department prior to testing, shall be used in the determination of carbon monoxide (CO) emissions from the stack in accordance with 40 CFR Part 60, Appendix A.
 - (3) Method 7, 7E, or equivalent method as approved by the Department prior to testing, shall be used in the determination of nitrogen oxides (NO_x) emissions from the stack in accordance with 40 CFR Part 60, Appendix A.
 - (4) Method 5, 5A, or equivalent method as approved by the Department prior to testing, shall be used in the determination of particulate matter (PM) emissions from the stack in accordance with 40 CFR 60, Appendix A.
 - (5) Method 201A and 202, or equivalent method as approved by the Department prior to testing, shall be used in the determination of particulate matter ≤ 10 micrometers

in aerodynamic diameter (PM₁₀) emissions from the stack in accordance with 40 CFR 60, Appendix A.

- (6) Method 201A and 202, or equivalent method as approved by the Department prior to testing, shall be used in the determination of particulate matter ≤ 2.5 micrometers in aerodynamic diameter (PM_{2.5}) emissions from the stack in accordance with 40 CFR 60, Appendix A.

4. Reporting Requirements

- (A) The Department must be notified in writing at least ten (10) working days in advance of all emissions testing to be conducted and submitted as demonstration of compliance with this Permit. The following information shall be provided with the notification: [COHRAR § 3.3.4]

- (1) the date the test crew is expected to arrive, the date and time of the anticipated start of the first run, how many and which emission points are to be tested, and the names of the person(s) and/or testing company that will conduct the tests;
- (2) a complete description of each sampling train to be used, including type of media used in determining gas stream composition, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning);
- (3) a description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity; and
- (4) a sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the permittee or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

- (B) The results of all emissions tests shall be forwarded to the Department, in writing, within fifteen (15) working days of completion of testing, unless an extension of time is specifically approved by the Department. [COHRAR §§ 1.9.1, 1.9.2]

- (C) The semi-annual monitoring reports required by I.B.6. of his Permit shall include the following information for each calendar month: [COHRAR §§ 1.9.2, 3.5.4, Part 14.5 Subpart III § 63.3120]

- (1) The VOC and VHAP material throughput, emissions, and compliance information identified in III.A.6. (A) and (B) below.
- (2) The quantity of the solvents of VOCs in the coatings applied.

- (3) The VOCs not released or exhausted into the atmosphere by the thermal oxidizer(s).
 - (4) The VOCs vented to the thermal oxidizer(s) by the process operation.
 - (5) The estimated averaged destruction efficiency of the thermal oxidizer(s).
 - (6) The VOCs released or exhausted into the atmosphere by the thermal oxidizer(s).
 - (7) The cumulative or total quantity of VOCs released or exhausted into the atmosphere by the machines and thermal oxidizer control units during the applicable month and previous eleven (11) months.
 - (8) The time(s) and date(s), duration, cause(s) and corrective action taken for any period when the operating temperature of the thermal oxidizer was less than the minimum temperature determined as specified in III.A.3(F) above and recorded as specified in III.A.3(G) above.
 - (9) The time(s) and date(s), duration, cause(s), corrective action taken for any bypass of the thermal oxidizer, and the excess VOC and VHAP emissions which resulted from each bypass in accordance with III.A.6(C) below.
 - (10) Any time(s) and date(s), duration, cause(s) and corrective action(s) taken for any deviation from the emission limitations or work practice requirements of this Permit.
- (D) Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance. [COHRAR §§ 1.9.1, 3.5.4]

5. Electronic Reporting to EPA

Performance Test Reports and Semi-annual Monitoring Reports must be submitted to EPA electronically in accordance with the requirements included in III.A.5(A) through (E) below. [COHRAR Part 14.5, Subpart III § 63.3120]

- (A) For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (https://www3.epa.gov/ttn/chief/ert/ert_info.html) at the time of the test, the permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternative file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site, once the XML schema is available. If the permittee claims that some of the performance test information being submitted is confidential business information (CBI), the permittee

must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/ OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

- (B) *Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test.* The results of the performance test must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the ERT generated package or alternative file to the EPA via CEDRI.
- (C) *Confidential business information (CBI).* If some of the information submitted is CBI, a complete file must be submitted, including information claimed to be CBI, to the EPA. The file must be generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/ CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described above.
- (D) *Claims of EPA system outage.* For reports that are required to be electronically submitted through CEDRI in the EPA's CDX, a claim of EPA system outage may be made for failure to comply timely with the reporting requirement. To assert a claim of EPA system outage, the following requirements must be met:
 - (1) The claimant must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either the EPA's CEDRI or CDX systems.
 - (2) The outage must have occurred within the period of time beginning five (5) business days prior to the date that the submission is due.
 - (3) The outage may be planned or unplanned.
 - (4) Notification must be submitted to EPA in writing as soon as possible following the date it was first known, or through due diligence should have been known, that the event may cause or has caused a delay in reporting. The written notification to EPA must identify the date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable; a rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage; measures taken or to be taken to minimize the delay in reporting; and the date by which the report will be submitted, propose to report, or if the reporting requirement has been met at the time of the notification, the date the report was submitted.
 - (5) The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion EPA. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved.

- (E) *Claims of force majeure.* For reports that are required to be electronically submitted through CEDRI in the EPA's CDX, a claim of EPA *force majeure* may be asserted for failure to comply timely with the reporting requirement. To assert a claim of force majeure, the claimant must meet the following requirements:
- (1) A claim may be submitted if a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five (5) business days prior to the date the submission is due. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the permittee, its contractors, or any entity controlled by the permittee that prevents compliance with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (e.g., hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the permittee (e.g., large scale power outage).
 - (2) Notification must be submitted to EPA in writing as soon as possible following the date it was first known, or through due diligence should have been known, that the event may cause or has caused a delay in reporting. The written notification must include a written description of the force majeure event; a rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event; measures taken or to be taken to minimize the delay in reporting; and the date by which the report is proposed to be submitted, or if the reporting requirement has already been met at the time of the notification, the date the report was submitted.
 - (3) The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of EPA. In any circumstance, the reporting must occur as soon as possible after the force majeure event occurs.

6. Record Keeping Requirements

- (A) Accurate and understandable records of consumption of VOCs, which record at least the last five (5) 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 permit. These records shall contain the following information: [COHRAR §§ 1.9.1, 3.5.4]
- (1) The type, quantity in gallons, and weight in pounds of each VOC or VHAP containing material used during each calendar month.
 - (2) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
 - (3) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
 - (4) Compliance with VOC and VHAP limits shall be based upon monthly material use

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

- (5) Complete inventories of the VOC and VHAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
 - (6) The amounts of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
 - (7) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (B) By the 30th day of the month following the end of each month, compliance with all provisos in this Permit will be determined. These records will be maintained for five (5) years. [COHRAR §§ 1.9.1, 3.5.4]
- (C) When any bypassing of any thermal oxidizer (TO) occurs, the time, date, and duration; estimated VOC emissions; and equipment process(es) bypassed will be recorded. Records will be maintained of any malfunction or non-operation of any TO that results in an increase in VOC emissions from any or all process equipment. These records will be maintained in a form suitable for inspection for a period of five (5) years. [COHRAR §§ 1.9.1, 1.12.1, 3.5.4]
- (D) Logbooks or electronic records of the twice weekly maintenance checks required in proviso III.A.2(L) shall be retained for at least five (5) years and available for inspection upon request. These logbooks or electronic records should also include the nature and date of any maintenance actions taken to correct maintenance episodes as required in III.A.2(L).

III.B. Stamping Operations

1. Emission Limitations

- (A) Emissions of Volatile Organic Compounds (VOCs) from this Unit, Combined Toyota and Mazda Lines Stamping Shop (Unit 100-TM1 and Unit 100-TM2), shall not exceed 71.0 tons per year (TPY) in any consecutive rolling 12-month period.
- (B) This Unit, Combined Toyota and Mazda Lines Stamping Shop (Unit 100-TM1) shall not use Rust Preventive Oil with a VOC content greater than 4.66 pounds/gallon (as utilized) and shall use Rust Preventive Oil with lower VOC content where technically / commercially available.

III.C. Welding Operations

1. Emission Limitations

- (A) Emissions of VOCs from this Unit, Toyota Line Welding Operations (Units 150-T1 and 150-T2), shall not exceed 39.1 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (B) Emissions of VOCs from this Unit, Mazda Line Welding Operations (Unit 150-M1 and Unit 150-M2) shall not exceed 33.7 tons per year (TPY) in any consecutive rolling 12-month period.

III.D. Surface Coating and Assembly Operations

1. Emission Limitations

- (A) Emissions of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Unit 200-T1, Unit 200-T2, Unit 200-T4, Unit 200-T7, Unit 200-T8, and Unit 200-T13), shall not exceed 364.5 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (B) Emissions of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Unit 200-M1, Unit 200-M2, Unit 200-M3, Unit 200-M5, Unit 200-M6, Unit 200-M7, and Unit 200-M12 combined), shall not exceed 316.79 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (C) Emissions of VOCs from this Unit, Toyota Line (Unit MCM-T10), from all Miscellaneous Cleaning Materials shall not exceed 48.2 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (D) Emissions of VOCs from this Unit, Mazda Line (Unit MCM-M9), from all Miscellaneous Cleaning Materials shall not exceed 72.4 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (E) Emissions of VOCs from this Unit, Toyota Line (Unit 200-T11), from all Purge Materials shall not exceed 169.6 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (F) Emissions of VOCs from this Unit, Mazda Line (Unit 200-M10), from all Purge Materials shall not exceed 169.6 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (G) Emissions of VOCs from this Unit, Toyota Line (Unit WS-T12), from all Wiping Solvents

shall not exceed 18 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]

- (H) Emissions of VOCs from this Unit, Mazda Line (Unit WS-M11), from all Wiping Solvents shall not exceed 13.5 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (I) Emissions of VOCs from this Unit, Toyota Line (Unit HW-T1), from Hinge Wax Application shall not exceed 21.9 tons/year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (J) Emissions of VOCs from this Unit, Mazda Line (Unit HW-M1), from Hinge Wax Application shall not exceed 13.21 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (K) Emissions of VOCs from this Unit, Mazda Line (Unit 300-M1), from Wax Application shall not exceed 20.7 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (L) Emissions of VOCs from this Unit, Combined Toyota and Mazda Lines (Unit 200-JC), from all Jig Cleaning stripping, rust preventative, and degreasing materials shall not exceed 6.8 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]
- (M) Emissions of VOCs from each of these Units, Toyota Line Primecoat (E-Coat) (Unit 200-T1) and Mazda Line Primecoat (E-Coat) (Unit 200-M1), shall not exceed 1.34 pounds per gallon of applied coating solids (ACS) on a calendar monthly average. [COHRAR Part 13.2 Subpart MM § 60.392(a)]
- (N) Emissions of VOCs from each of these Units, Toyota Line application of Topcoat (Basecoat & Clearcoat) (Unit 200-T4) and Mazda Line application of Topcoat (Basecoat & Clearcoat) (Unit 200-M3), shall not exceed 12.27 pounds per gallon of ACS on a calendar monthly average. [COHRAR Part 13.2 Subpart MM § 60.392(c)]
- (O) Emissions of VOCs from each of these Units, Toyota Line Primecoat (E-Coat) (Unit 200-T1) and Mazda Line Primecoat (E-Coat) (Unit 200-M1), shall not exceed 0.1 pounds per gallon of ACS on a calendar monthly average. [COHRAR § 3.5.4]
- (P) Emissions of VOCs from each of these Units, Toyota Line Topcoat (Basecoat Booth & Clearcoat Booth and Oven and the Wet-on-Wet System) (Unit 200-T4) and Mazda Line Guidecoat (Basecoat Booth & Clearcoat Booth and Oven) (Unit 200-M3), shall not exceed 4.80 pounds per gallon ACS on a calendar monthly average. [COHRAR § 3.5.4]
- (Q) Emissions of VOCs from each of these Units, Toyota Line Sealer/Deadener (Unit 200-T2) and Mazda Line Sealer/Deadener (Unit 200-M2), shall not exceed 0.30 pounds per gallon ACS, as applied, on a calendar monthly average. [COHRAR § 3.5.4]

- (R) Emissions of VOCs from this Unit, Mazda Line Blackout (Unit 200-M5), shall not exceed 1.00 pounds per gallon ACS, as applied, on a calendar monthly average. [COHRAR § 3.5.4]
- (S) Emissions of VOCs from this Unit, Mazda Line Wax Application (Unit 300-M1), shall not exceed 4.0 pounds per gallon ACS, as applied, on a calendar monthly average. [COHRAR § 3.5.4]
- (T) A VOC removal efficiency of not less than 85% shall be achieved by the Carbon Concentrator portion of the control system CCBOOTH-CC/TO (Unit 1500-103), which controls emissions from the Combined Exhaust from the Clearcoat Booths on the Mazda and Toyota Lines.
- (U) A VOC removal efficiency of not less than 95% shall be achieved by each of the following: [COHRAR §§ 1.10.2, 3.5.4]
- (1) ECOAT-TO (Unit 1500-101) – thermal oxidizer controlling emissions from the Toyota and Mazda Lines E-Coat Systems Combined Exhaust;
 - (2) SEALER-TO (Unit 1500-102) – thermal oxidizer controlling emissions from the Toyota and Mazda Lines Sealer Ovens Combined Exhaust;
 - (3) Thermal oxidizer portion of the control system CCBOOTH-CC/TO (Unit 1500-103), which controls emissions from the Toyota and Mazda Lines Clearcoat Booths Combined Exhaust; and
 - (4) TCOVEN-TO (Unit 1500-104) – thermal oxidizer controlling emissions from the Toyota and Mazda Lines Topcoat Ovens Combined Exhaust.
- (V) Emissions of carbon monoxide (CO) from the Thermal Oxidizer: ECOAT-TO (Unit 1500-101) which controls VOC emissions from the Toyota and Mazda Lines E-Coat Systems Combined Exhaust shall not exceed 0.52 pounds/hour, based on a three-(3)-hour arithmetic average. [COHRAR §§ 1.10.2, 3.5.4]
- (W) Emissions of CO from the Thermal Oxidizer: SEALER-TO (Unit 1500-102) which controls VOC emissions from the Toyota and Mazda Lines Sealer Ovens Combined Exhaust shall not exceed 0.24 pounds/hour, based on a three-(3)-hour arithmetic average. [COHRAR §§ 1.10.2, 3.5.4]
- (X) Emissions of CO from the Carbon Concentrator/Thermal Oxidizer CCBOOTH-CC/TO (Unit 1500-103), which controls VOC emissions from the Toyota and Mazda Lines Clearcoat Booths Combined Exhaust, and from the Thermal Oxidizer TCOVEN-TO (Unit 1500-104), which controls VOC emissions from the Toyota and Mazda Lines Sealer Ovens Combined Exhaust, shall not exceed 1.09 pounds/hour, based on a three-(3)-hour arithmetic average. [COHRAR §§ 1.10.2, 3.5.4]

- (Y) Emissions of nitrogen oxides (NO_x) from the Thermal Oxidizer: ECOAT-TO (Unit 1500-101) which controls VOC emissions from the Toyota and Mazda Lines E-Coat Systems Combined Exhaust shall not exceed 1.72 pounds/hour, based on a three-(3)-hour arithmetic average. [COHRAR §§ 1.10.2, 3.5.4]
- (Z) Emissions of NO_x from the Thermal Oxidizer: SEALER-TO (Unit 1500-102) which controls VOC emissions from the Toyota and Mazda Lines Sealer Ovens Combined Exhaust shall not exceed 0.32 pounds/hour, based on a three-(3)-hour arithmetic average. [COHRAR §§ 1.10.2, 3.5.4]
- (AA) Emissions of NO_x from the Carbon Concentrator/Thermal Oxidizer CCBOOTH-CC/TO (Unit 1500-103), which controls VOC emissions from the Toyota and Mazda Lines Clearcoat Booths Combined Exhaust, and from the Thermal Oxidizer TCOVEN-TO (Unit 1500-104), which controls VOC emissions from the Toyota and Mazda Lines Sealer Ovens Combined Exhaust, shall not exceed 1.73 pounds/hour, based on a three-(3)-hour arithmetic average. [COHRAR §§ 1.10.2, 3.5.4]
- (BB) Emissions of Particulate Matter (PM) from each of these Units, Toyota Line Topcoat Booth (Unit 200-T4) and Mazda Line Topcoat Booth (Unit 200-M3), shall not exceed 0.6 pounds per hour. [COHRAR §§ 1.10.2, 3.5.4]
- (CC) Emissions of PM from each of these Units, Toyota Line Cavity Wax Booth (Unit 200-T7) and Mazda Line Cavity Wax Booth (Unit 200-M6), shall not exceed 0.02 pounds per hour. [COHRAR §§ 1.10.2, 3.5.4]
- (DD) Emissions of PM from the Toyota Line Offline Repair Booth (Unit 200-T8) shall not exceed 0.1 pounds per hour. [COHRAR §§ 1.10.2, 3.5.4]
- (EE) Emissions of PM from the Mazda Line Offline Repair Booth (Unit 200-M7) shall not exceed 0.02 pounds per hour. [COHRAR §§ 1.10.2, 3.5.4]
- (FF) Emissions of PM from the Mazda Line Blackout Booth (Unit 200-M5) shall not exceed 0.1 pounds per hour. [COHRAR §§ 1.10.2, 3.5.4]
- (GG) The following sources are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light Duty Trucks (IIII) as defined in 40 CFR 63, Subpart IIII §§63.3080-3176 to include §63.3890 (a), (b), (c), (d), and (f) on a calendar monthly average: [COHRAR Part 14.5, Subpart IIII §§ 63.3080, *et. seq.*]
- (1) Toyota and Mazda Lines - Phosphate/E-Coat System Sources (Units 200-T1 and 200-M1);
 - (2) Toyota and Mazda Lines - Sealer/Misc. Body Coating Sources (Units 200-T2 and 200-M2);

- (3) Toyota and Mazda Lines - Topcoat System Sources (Units 200-T4 and 200-M3);
- (4) Toyota and Mazda Lines - Miscellaneous Cleaning Sources (Units MCM-T10 and MCM-M9);
- (5) Toyota and Mazda Lines - Purge Material Sources (Units 200-T11 and 200-M10);
- (6) Toyota and Mazda Lines - Wiping Solvent Sources (Units WS-T12 and WS-M11);
- (7) Toyota and Mazda Lines - Assembly Final Repair Area Sources (Units 300-T2 and 300-M2);
- (8) Toyota and Mazda Lines - Windshield Installation Operations (Units 300-T3 and 300-M3);
- (9) Toyota and Mazda Lines - Hinge Wax Application Sources (HW-T1 and HW-M1);
and
- (10) Mazda Line - Wax Application Sources (Unit 300-M1).

III.E. Miscellaneous Natural Gas-Fired Combustion Sources

1. Emission Limitations

- (A) Emission of particulate matter (PM) shall not exceed 0.0005 lb/MMBtu from any natural gas-fired combustion unit (Unit 1500). [COHRAR §§ 1.10.2, 3.5.4]
- (B) Emissions of particulate matter ≤ 10 micrometers in aerodynamic diameter (PM_{10}) shall not exceed 0.0005 lb/MMBtu from any natural gas-fired combustion unit (Unit 1500). [COHRAR §§ 1.10.2, 3.5.4]
- (C) Emissions of particulate matter ≤ 2.5 micrometers in aerodynamic diameter ($PM_{2.5}$) shall not exceed 0.0005 lb/MMBtu from any natural gas-fired combustion unit (Unit 1500). [COHRAR §§ 1.10.2, 3.5.4]
- (D) Emissions of PM from each piece of natural gas-fired combustion equipment shall not exceed the value of E, calculated using the following equation:

$$E = 1.38H^{-0.44}$$

where E is the hourly emission rate in pounds per million Btu (lb/MMBtu) and H is the heat input in millions of Btu per hour (MMBtu/hr). [COHRAR § 6.3.1]

- (E) Emissions of nitrogen oxides (NO_x) from the process ovens shall not exceed 0.072 lb/MMBtu of heat input. [COHRAR §§ 1.10.2, 3.5.4]

- (F) Emissions of NO_x from the spare parts oven shall not exceed 0.10 lb/MMBtu of heat input. [COHRAR §§ 1.10.2, 3.5.4]
- (G) Emissions of NO_x from the thermal oxidizers shall not exceed 0.06 lb/MMBtu of heat input. [COHRAR §§ 1.10.2, 3.5.4]
- (H) Emissions of NO_x from the jig cleaning/miscellaneous devices shall not exceed 0.06 lb/MMBtu of heat input. [COHRAR §§ 1.10.2, 3.5.4]
- (I) Emissions of NO_x from all process devices not identified in III.E.1(E), (F), (G) and (H) above, and from natural gas-fired units w/low NO_x burners (Unit 1500 HVAC, except for HVAC units ≤ 1.5 MMBtu/hr), shall not exceed 0.06 lb/MMBtu of heat input. [COHRAR §§ 1.10.2, 3.5.4]

2. Work Practice Requirements

- (A) The permittee shall utilize good work practices that are practically and economically feasible that reasonably minimize emissions of NO_x and other pollutants in all operations. Periodic maintenance of each listed burner in Natural Gas-Fired Units (Unit 1500) will occur at a minimum as suggested by the manufacturer of the unit. [COHRAR § 3.5.4]
- (B) MTMUS shall conduct tune-ups of Unit 1500 natural gas-fired process equipment as identified below: [COHRAR § 3.5.4]
 - (1) Every year on the Toyota Line ED Oven (Unit 1500-8) and the Mazda Line ED Oven (Unit 1500-21).
 - (2) Every two (2) years on the Toyota Line Phos Hot Water Boiler (Unit 1500-7), the Toyota Line Sealer Oven (Unit 1500-9), the Toyota Line Paint Oven (Unit 1500-15), the Mazda Line Phos Hot Water Boiler (Unit 1500-20), the Mazda Line Sealer Oven (Unit 1500-22), and the Mazda Line Paint Oven (Unit 1500-28).
 - (3) Every five (5) years on the Toyota & Mazda Replacement Parts Oven (Unit 1500-18).
- (C) Tune-ups performed pursuant to the requirements of III.E.2(B) above must be performed annually, biennially or at five-(5)-year intervals, as indicated. The first tune-up must be performed not later than thirteen (13) months, twenty-five (25) months or sixty-one (61) months (as applicable) after initial start-up, and subsequent tune-ups must be performed no more than thirteen (13) months, twenty-five (25) months or sixty-one (61) months (as applicable) after the previous tune-up. As a minimum, the scope of the tune-up shall include the following:
 - (1) Inspect the burner, and clean or replace any components of the burner as necessary.

- (2) Inspect the flame pattern and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
 - (3) Inspect the system controlling the air-to-fuel ratio and ensure that it is correctly calibrated and functioning properly.
 - (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
 - (5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million by volume, and oxygen in volume percent, before and after adjustments are made. Measurements may be made on either a wet or dry basis, as long as the same basis is used before and after the adjustments are made.
- (D) At all times, MTMUS shall operate and maintain the Unit 1500 sources listed in III.E.2(B) above in a manner consistent with safety and good air pollution control practices for minimizing emissions.

3. Monitoring Requirements

When operating, each listed burner in the section Natural Gas-Fired Units (Unit 1500) shall be visually observed a minimum of once monthly for greater than normal visible emissions as determined by previous observations. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall be taken within twenty-four (24) hours, followed by an additional observation to confirm that emissions are reduced to normal. Records shall be recorded in a permanent form suitable for inspection upon request and retained for at least five (5) years following the date of such measurement. [COHRAR § 3.5.4]

4. Reporting Requirements

The semi-annual monitoring reports required by I.B.6. of his Permit shall include the following information for each calendar month: [COHRAR §§ 1.9.2, 3.5.4]

- (A) The natural gas consumption, emissions, and compliance information identified in III.E.5(A) below.
- (B) Any deviation from the emission limitations or work practice requirements of this Permit.
- (C) An initial compliance report covering the period beginning on the compliance date that is specified for the Unit 1500 sources listed in III.E.2(B) above as listed in 40 CFR §63.7495 and ending on July 31 or January 31, whichever date is the first date that occurs at least one (1), two (2), or five (5) years (as applicable) after the compliance date that is specified for the boiler in §63.7495. Subsequent compliance reports must cover the annual, biennial, or five-(5)-year periods (as applicable) from January 1 to December 31. The compliance report shall include the minimum information and be submitted as follows:

- (1) Company and Facility name and address.
 - (2) Process unit information, emissions limitations, and operating parameter limitations.
 - (3) Date of report and beginning and ending dates of the reporting period.
 - (4) The total operating time during the reporting period.
 - (5) The date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or five-(5)-year tune-up. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a five-(5)-year period and was delayed until the next scheduled or unscheduled unit shutdown.
- (D) If there were no deviations from the work practice standards during the reporting period, a statement that there were no deviations from the work practice standards during the reporting period. If there was a deviation from a work practice standard during the reporting period, the report must contain a description of the deviation and resolution.
- (E) Statement by a responsible official with that official's name, title, and signatures, certifying the truth, accuracy, and completeness of the content of the report.
- (F) All compliance reports must be submitted to EPA (Region 4) electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). At the discretion of the Administrator, reports must also be submitted to the Administrator in the format specified by the Administrator.
- (G) All compliance reports must be submitted to the City of Huntsville Department of Natural Resources and Environmental Management via hardcopy in the mail or electronically via email.
- (H) The compliance reports must be postmarked or submitted no later than January 31.

5. Recordkeeping Requirements

- (A) Accurate and understandable records of consumption of natural gas, which record at least the last five (5) 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 permit. These records shall contain the following information: [COHRAR §§ 1.9.1, 3.5.4]
- (1) Usage of natural gas by Natural Gas-Fired Units (Unit 1500) in the previous month.
 - (2) Calculations of criteria pollutants emitted based on natural gas used in the previous month using established emission factors.

- (3) The amounts of VOCs and other criteria pollutants emitted per calendar month in units of tons.
 - (4) The rolling 12-month total of VOCs and other criteria pollutants in units of tons.
- (B) By the 30th day of the month following the end of each month, compliance with all provisos in this Permit will be determined. These records will be maintained for five (5) years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance. [COHRAR §§ 1.9.1, 3.5.4]
- (C) Logbooks of the monthly visible observations required in proviso III.E.3 above shall be retained for at least five (5) years and available for inspection upon request. These logbooks should also include the nature and date of any maintenance actions taken to correct excess opacity episodes. [COHRAR §§ 1.9.1, 3.5.4]
- (D) A record of required tune-ups performed pursuant to III.E.2(C) and (D) above shall be maintained which include, as a minimum, the following information: [COHRAR §§ 1.9.1, 3.5.4]
 - (1) The date the tune-up was performed.
 - (2) The individual or entity that performed the tune-up.
 - (3) The scope of work included in the tune-up.
 - (4) The concentration of carbon monoxide (CO) in the effluent stream in parts per million by volume (ppmv), and oxygen (O₂) in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - (5) A description of any corrective actions taken as a part of the tune-up.
- (E) A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status must be kept in a form suitable and readily available for expeditious review for five (5) years following the date of each occurrence (on site or accessible from on site for at least two (2) years). [COHRAR Part 14.5, Subpart DDDDD, § 63.7555]

III.F. Bulk Organic Liquid Storage

1. Design and Work Practice Requirements

- (A) These units (Unit 1600-5 - two (2) 15,000-gallon unleaded gasoline storage tanks) shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984 (Subpart Kb) as defined in 40 CFR Part 60, Subpart Kb §60.110b-117b.
- (B) This unit (Unit 1600-4 - one (1) 9,500-gallon windshield washer fluid storage tank) is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants (HAP) Organic Liquids Distribution (Non-Gasoline) (Subpart EEEE) as a “New Source.”
- (C) A properly maintained Stage I vapor recovery system and submerged fill pipes/bottom filling must be operated on this unit (Unit 1600-5 - two (2) 15,000-gallon unleaded gasoline storage tanks).
- (D) This unit (Unit 1600-4 - one (1) 9,500-gallon windshield washer fluid storage tank) shall comply with the applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants (HAP) Organic Liquids Distribution (Non-Gasoline) (Subpart EEEE) as a “New Source,” which may include an internal or external floating roof or equivalent alternatives approved by the Department.
- (E) These storage tanks (Unit 1600-5 - two (2) 15,000-gallon unleaded gasoline storage tanks) shall store gasoline only. Records will be kept showing the contents of each storage tank. These will be available for inspection.

2. Monitoring Requirements

- (A) This source (Unit 1600-5) shall comply with the compliance and monitoring requirements set forth in 40 CFR §60.116b.
- (B) This unit (Unit 1600-4) (one (1) 9,500-gallon windshield washer fluid storage tank) shall comply with the applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants (HAP) Organic Liquids Distribution (Non-Gasoline) (Subpart EEEE) as a “New Source”.

3. Reporting Requirements

- (A) This source shall comply with the reporting requirements set forth in 40 CFR §60.115.
- (B) This unit (Unit 1600-4) (one (1) 9,500-gallon windshield washer fluid storage tank) shall comply with the applicable requirements of the National Emission Standards for Hazardous

Air Pollutants (NESHAPs) for Hazardous Air Pollutants (HAP) Organic Liquids Distribution (Non-Gasoline) (Subpart EEEE) as a “New Source.”

4. Recordkeeping Requirements

- (A) This source shall comply with the recordkeeping requirements set forth in 40 CFR §60.115b.
- (B) Readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the vessel shall be kept for the life of the vessel at the facility.

III.G. Emergency Engines

Three (3) diesel-fired emergency generator engines (Units 1700-1a, 1700-1b, & 1700-1c), two (2) natural gas-fired emergency generator engines (Units 1700-3a & 1700-3b), and two (2) diesel-fired emergency fire pump engines (Unit 1700-2) are covered under this Permit.

1. Emission Limitations

- (A) Each diesel-fired emergency engine shall meet the applicable emission limitations in Table 4 of 40 CFR Part 60 Subpart IIII. Certification by the manufacturer(s) shall be used to demonstrate compliance with this requirement. However, such manufacturer certifications do not preclude the Director from requiring emissions testing pursuant to paragraph I.B.1 of this Permit. [COHRAR Part 13.2 Subpart IIII, §§ 60.4205; COHRAR Part 14.5 Subpart ZZZZ, § 63.6590(c)(1)]
- (B) Each natural gas-fired emergency engine shall meet the applicable emission limitations in Table 1 of 40 CFR Part 60 Subpart JJJJ. Certification by the manufacturer(s) shall be used to demonstrate compliance with this requirement. However, such manufacturer certifications do not preclude the Director from requiring emissions testing pursuant to paragraph I.B.1 of this Permit. [COHRAR Part 13.2 Subpart JJJJ, §§ 60.4233; COHRAR Part 14.5 Subpart ZZZZ, § 63.6590(c)(1)]
- (C) Only Low Sulfur Diesel Fuel (15 ppm) with a sulfur content of 15 ppm or less may be used as fuel in the diesel-fired emergency engines. [COHRAR § 3.5.4]

2. Work Practice Requirements

- (A) Each emergency engine must be operated and maintained in accordance with the manufacturers’ recommendations. [COHRAR Part 13.2 Subpart IIII, § 60.4211(a)(1); COHRAR Part 13.2 Subpart JJJJ, § 60.4243(a)(1); COHRAR Part 14.5 Subpart ZZZZ, § 63.6625(e)]
- (B) As a minimum, the following maintenance schedule shall be utilized for each emergency

engine: [COHRAR § 3.5.4, Part 14.5 Subpart ZZZZ, § 63.6603(a), Table 2c]:

- (1) Change oil and filter every five-hundred (500) hours of operation or within one (1) year plus thirty (30) days of the previous change, whichever comes first;
 - (2) Inspect air cleaner (for compression-ignition engines) and spark plugs (for spark-ignition engines) every one-thousand (1,000) hours of operation or within one (1) year plus thirty (30) days of the previous change, whichever comes first;
 - (3) Inspect all hoses and belts every five-hundred (500) hours of operation or within one (1) year plus thirty (30) days of the previous change, whichever comes first, and replace as necessary.
 - (4) Minimize each engine's time spent at idle and minimize each engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed thirty (30) minutes, after which time the non-startup emission limitations apply.
- (C) The permittee shall utilize good work practices that are practically and economically feasible that reasonably minimize diesel usage in all operations. Diesel fuel will be handled in such a way as to minimize VOC emissions from storage, handling, and cleanup. Fresh or spent diesel fuel will be stored in closed containers. [COHRAR § 3.5.4]

3. Monitoring Requirements

Each diesel-fired emergency engine must be equipped with a non-resettable hour meter. [COHRAR Part 13.2 Subpart IIII, § 60.4209; COHRAR Part 13.2 Subpart JJJJ, § 60.4237; COHRAR Part 14.5 Subpart ZZZZ, § 63.6625(f)]

4. Operational Limitations

- (A) The emergency engines are to be operated as an emergency stationary RICE (Reciprocating Internal Combustion Engines) as defined in § 63.6675. [COHRAR § 3.1.2(g); COHRAR Part 13.2 Subpart IIII, §§ 60.4211(f), 60.4219; COHRAR Part 13.2 Subpart JJJJ, §§ 60.4243(d), 60.4248; COHRAR Part 14.5 Subpart ZZZZ, §§ 63.6640(f), 63.6675]
- (B) In addition to operation in emergency situations, each diesel-fired fire pump engine may be operated for necessary maintenance checks and readiness testing provided that such operation does not exceed one-hundred (100) hours per calendar year. Each engine may also be operated for up to fifty (50) hours per calendar year in non-emergency situations. The fifty (50) hours per year of non-emergency operation are counted as part of the one-hundred (100) hours per calendar year for maintenance and readiness testing. [COHRAR Part 13.2 Subpart IIII, § 60.4211(f); COHRAR Part 13.2 Subpart JJJJ, § 60.4243(d); COHRAR Part 14.5 Subpart ZZZZ, § 63.6640(f)]
- (C) In addition to operation in emergency situations, each diesel-fueled fire pump engine may

be operated for necessary maintenance checks and readiness testing provided that such operation does not exceed one-hundred (100) hours per calendar year. The engine may also be operated for up to fifty (50) hours per calendar year in non-emergency situations. The fifty (50) hours per year of non-emergency operation are counted as part of the one-hundred (100) hours per calendar year for maintenance and readiness testing. [COHRAR Part 13.2 Subpart IIII, § 60.4211(f); COHRAR Part 14.5 Subpart ZZZZ, § 63.6640(f)]

(D) The following operational limitations apply to this each emergency engine with the exception of the fire pump engines: [COHRAR Part 13.2 Subpart IIII, § 60.4211(f); COHRAR Part 13.2 Subpart JJJJ, § 60.4243(d); COHRAR Part 14.5 Subpart ZZZZ, § 63.6640(f)]

- (1) There is no time limit on the use of the emergency engine in emergency situations.
- (2) Each emergency engine may be operated for maintenance checks and readiness testing, for a maximum of one-hundred (100) hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond one-hundred (100) hours per calendar year. Any operation for non-emergency situations as allowed by paragraph III.G.4(D)(3) below counts as part of the one-hundred (100) hours per calendar year allowed by this paragraph III.G.4(D)(2).
- (3) Each emergency engine may be operated for up to fifty (50) hours per calendar year in non-emergency situations. The fifty (50) hours of operation in non-emergency situations are counted as part of the one-hundred (100) hours per calendar year for maintenance and testing and emergency demand response provided in paragraph III.G.4(D)(2) above. The fifty (50) hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. The preceding limitation notwithstanding, the fifty (50) hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all the following conditions are met:
 - (a) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
 - (b) The dispatch is intended to mitigate local transmission and/or distribution limitations so to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

- (c) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- (d) The power is provided only to the facility itself or to support the local transmission and distribution system.
- (e) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

5. Recordkeeping Requirements

- (A) Records of all maintenance performed on each emergency engine pursuant to the requirements of paragraph III.G.2 above shall be maintained in a form suitable for inspection. [COHRAR Part 13.2 Subpart III § 60.4214(a)(2)(ii); COHRAR Part 13.2 Subpart JJJJ, § 60.4245(a)(2); COHRAR Part 14.5 Subpart ZZZZ, § 63.6655(e)]
- (B) Records of the hours of operation of each engine must be maintained, which are recorded through the non-resettable hour meters required by paragraph III.G.3 above. These records must be maintained in a form suitable for inspection and shall include how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation, including a description of the non-emergency operation sufficiently detailed to demonstrate that the restrictions on non-emergency operation included in subparagraph III.G.4 above have not been violated. [COHRAR § 1.9.1 and Part 13.2 Subpart III, § 60.4214(b); COHRAR Part 13.2 Subpart JJJJ, § 60.4245(b); COHRAR Part 14.5 Subpart ZZZZ § 63.6655(f)]
- (C) Billing statements from supplier(s) may be used to record the sulfur content of diesel fuel supplied. Such records shall be maintained and prepared in a form suitable for inspection within thirty (30) days of the end of the calendar month during which the fuel was received.

III.H. FEDERAL STRATOSPHERIC OZONE PROTECTION REQUIREMENTS

- 1. The permittee shall service, repair and maintain all appliances and refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances listed as refrigerants in 40 CFR Part 82, Subpart A, Appendices A and B, in accordance with the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Subpart F. [40 CFR Part 82, Subpart F; COHRAR § 3.9.5(a)]
- 2. No person under the direct or indirect control of the permittee shall knowingly vent or otherwise release any Class I or II substance into the environment during the repair,

servicing or maintenance or disposal of any such appliance or refrigeration equipment except as provided in 40 CFR Part 82, Subpart F. [40 CFR Part 82, Subpart F; COHRAR § 3.9.5(a)]

3. The permittee shall comply with all reporting and recordkeeping requirements in 40 CFR § 82.166. [40 CFR § 82.166; COHRAR § 3.9.5(a)]

IV. PERMIT SHIELD PROVISIONS

Not Applicable

V. TRIVIAL & INSIGNIFICANT ACTIVITIES

None

VI. COMPLIANCE SCHEDULE

The permittee shall achieve compliance with the terms and conditions of this Permit no later than:

Effective Date of Permit