CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DEPARTMENT

MAJOR SOURCE OPERATING PERMIT

Issued to: Y-Tec Keylex Toyotetsu Alabama, Inc. (YKTA) – OSP-3

Location: 9000 Greenbrier Parkway, NW, Unit #84

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-09-P424-Z001	Fabrication of Metal Parts Use of Rust Preventive Oil in Stamping Operations (Blanking and Transfer Presses) (OSP-3-TM2) Cleaning of Metal Parts (OSP-3-TM3) Welding Operations (OSP-3-TM4) E-Coat Surface Coating of Metal Parts and Drying Oven with Thermal Oxidizer (Unit OSP-3-TM1) Miscellaneous Natural Gas-Fired Combustion Equipment (Unit OSP-3-NG) Three (3) Diesel-Fueled Emergency Generator Engines (Units OSP-3-EG1, OSP-3-EG2, and OSP-3-EG3) and One (1) Diesel-Fueled Fire Pump Engine (Unit OSP-3-FP1)

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 Department 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.

Date of Issuance: April 9, 2025

Expiration Date: April 9, 2030

Permit Renewal Application Deadline: October 9, 2029

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DEPARTMENT
CITY OF HUNTSVILLE, ALABAMA

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I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT 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) Unless specified otherwise elsewhere in this Permit, 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, Record-Keeping 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 Department 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
Department of Natural Resources & Environmental Management
dnrem.reports.air@huntsvilleal.gov

and to:

U.S. EPA Region 4
EPA_R4_CAA_Reports@epa.gov
OR VIA
EPA's Compliance and Emissions Data Reporting Interface (CEDRI)

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(c)]

(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. <u>Revocation for Cause</u>

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 Department 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) PERMIT 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). As an On-Site Partner (OSP) with the Mazda Toyota Manufacturing US (MTMUS) automobile assembly plant, the initial permit application and air quality modeling included this facility, the other OSPs on the MTMUS campus, and the assembly plant. Consequently, any modification of this 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. Fabrication, Cleaning and E-Coat Application of Surface Coatings to Metal Parts

1. Emission Limitations

(A) Emission of Volatile Organic Compounds (VOCs) from the E-Coat application of surface coatings (Unit OSP-3-TM1) shall not exceed 23.8 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]

(B) Emission of Volatile Organic Compounds (VOCs) from the use of rust preventive oils (Units OSP-3-TM2) and cleaning materials (Unit OSP-3-TM3) shall not exceed 68.6 tons per year (TPY) in any consecutive rolling 12-month period. [COHRAR § 3.5.4]

(C) The Metal Parts E-Coat & Oven (OSP-3-TM1) and use of Cleaning Materials (OSP-3-TM3) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as defined in 40 CFR 63, Subpart MMMM §63.3880-3981 to include §63.3890 (a) (1.9 pounds VHAP/gallon of coating solids/each 12-month compliance period). [COHRAR Part 14.5, Subpart MMMM § 63.3890(a)(1)]

(D) Emissions of Volatile Organic Compounds (VOC) from the E-Coat application of surface

coatings to metal parts (OSP-3-TM1) shall not exceed 0.04 pounds per gallon of applied coating solids (ACS). [COHRAR § 3.5.4]

(E) The thermal oxidizer serving the E-Coat Tank and Drying Oven (OSP-3-TM1) shall provide a VOC removal efficiency of 95% or greater. [COHRAR § 3.5.4]

(F) The thermal oxidizer serving the E-Coat Tank and Drying Oven (OSP-3-TM1) shall not emit greater than 1.47 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average). [§§ 1.9.1, 1.10.2, 3.5.4]

(G) The thermal oxidizer serving the E-Coat Tank and Drying Oven shall not emit greater than 0.88 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average). [§§ 1.9.1, 1.10.2, 3.5.4]

(H) In the fabrication and stamping of metal parts (Unit OSP-3-TM2), the permittee shall not use Rust Preventive Oil with a Volatile Organic Compounds (VOCs) content greater than 4.66 pounds/gallon (as utilized). [COHRAR § 3.5.4]

(I) The stack(s) associated with this (these) source(s) 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. <u>Work Practice Requirements</u>

(A) Natural gas shall be the only fuel used in any combustion equipment other than the diesel-fueled emergency fire pump engine(s), the diesel-fueled emergency generator engines, and gasoline engines. [COHRAR § 3.5.4]

(B) The thermal oxidizer shall be operated at or above the temperature (3-run arithmetic average) at which compliance with the minimum control efficiency included in III.A.1(E) above is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance. [COHRAR § 1.12.1]

(C) Emissions from the E-Coat Tank (OSP-3-TM1) and Drying Oven (OSP-3-NG3) shall be captured and directed to the Thermal Oxidizer (Unit OSP-3-NG2). [COHRAR § 3.5.4]

(D) The permittee shall 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. As a minimum, the plan must specify practices and procedures to ensure that the items in III.A.2(D)(1) through (5) below are implemented: [COHRAR Part 14.5 Subpart MMMM § 63.3893]

(1) All organic HAP-containing coatings, thinners and/or other additives, cleaning materials and waste materials must be stored in closed containers.

(2) Spills of organic HAP-containing coatings, thinners and/or other additives, cleaning materials and waste materials must be minimized.

(3) Organic HAP-containing coatings, thinners and/or other additives, cleaning materials and waste materials must be conveyed from one location to another in closed containers or pipes.

(4) Mixing vessels which contain organic HAP-containing coatings or 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.

(E) The permittee shall utilize good work practices that are practically and economically feasible to minimize coating materials and clean-up/purge/general solvent usage in all operations to limit VOC emissions. Coatings, solvents and other VOC-containing materials shall be handled in such a way as to minimize VOC emissions from storage, handling, coating and clean-up. Closed containers shall be used for the storage of coatings and other fresh or spent VOC-containing materials, and for the storage and disposal of cloth or other material used for VOC-containing material clean-up or usage. [COHRAR § 3.5.4]

(F) If visible emissions from any stacks associated with these sources exceed 5%, measured in accordance with III.A.1(I) above, the operator shall investigate the cause and take any necessary corrective action. [COHRAR § 3.5.4]

3. <u>Monitoring Requirements</u>

(A) The Department may require emissions testing to verify compliance with the emission limitations specified in III.A.1 of this Permit. Any such emissions tests shall be conducted at the maximum rated capacity of the equipment and shall be performed in accordance with EPA Reference Methods, as described in Appendix A of 40 CFR Part 60. As a minimum, emissions testing shall be conducted on the Thermal Oxidizer (Unit OSP-3-NG2) serving the E-Coat Tank and Drying Oven (OSP-3-TM1) once every five (5) years, from the date of the initial performance test used to establish the operating temperature of the thermal oxidizer and demonstrate compliance with the control efficiency requirement in III.A.1(E) above. VOC emissions upstream and immediately downstream of the thermal oxidizer shall be measured using EPA Method 18 or 25/25A, as described in 40 CFR Part 60, Appendix A, as determined by the Department prior to testing. [COHRAR §§ 1.9.1, 1.10.2, 3.3.4, 3.5.4]

(B) Each emission point shall be equipped with sampling ports, ladders, platforms and other safety equipment to facilitate testing performed pursuant to III.A.3(A) of this Permit. Access to adequate utilities for operation of sampling and testing equipment shall also be

provided. [COHRAR §§ 3.1.3, 3.3.3]

(C) Information provided by the manufacturer in Material Safety Data Sheets (MSDS) or Technical Data Sheets (TSD) may be used to determine the HAP content by weight of each HAP-containing material used, provided that this information includes a listing of individual regulated HAP constituents expressed as a weight percent. In the event the Department requests verification of the manufacturer provided formulation data, the HAP content of coatings or other HAP-containing materials shall be determined on a random basis using EPA Test Method 311, as described in 40 CFR Part 63, Appendix A, or an alternative method approved in advance by the Department. [COHRAR §§ 1.9.1, 1.10.2]

(D) Information provided by the manufacturer in Material Safety Data Sheets (MSDS) or Technical Data Sheets (TSD) may be used to determine the VOC content by weight of each VOC-containing material used. In the event the Department requests verification of the manufacturer provided formulation data, the VOC content of coatings or other VOC-containing materials shall be determined on a random basis using EPA Test Method 24, as described in 40 CFR Part 60, Appendix A, or an alternative method approved in advance by the Department. [COHRAR §§ 1.9.1, 1.10.2]

(E) A continuous recorder for the E-Coat Thermal Oxidizer Exhaust – TO-OSP- 3 (Unit OSP-3-NG2) shall be installed, calibrated and maintained to record the combustion temperature in a permanent form suitable for inspection on request. The gas temperature monitor must be installed in the firebox or in the ductwork immediately downstream of the firebox before any appreciable heat exchange has occurred. The temperature monitor must have a sensitivity of 5 degrees Fahrenheit or 1.0% of the measured temperature, whichever is greater. An accuracy audit must be conducted at least once per quarter and after each deviation. Accuracy audit methods include comparisons of sensor outputs to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices. A visible inspection of each sensor must be conducted every quarter if redundant sensors are not used. [COHRAR Part 14.5 Subpart MMMM § 63.3968(c)]

4. <u>Reporting Requirements</u>

(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 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 source owner 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 thirty (30) 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 MMMM § 63.3920(a)]

(1) The VOC and VHAP material throughput, emissions and compliance information identified in III.A.6(B) below.

(2) The time(s) and date(s), duration, cause(s) and corrective action taken for any period when the operating temperature of the TO was less than the minimum temperature determined as specified in III.A.6(C) below and recorded as specified in III.A.6(D) below.

(3) 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(F) below.

(4) Any deviation from the emission limitations or work practice requirements of this Permit.

(D) If the permittee at any time exceeds the emission limitations in this Permit, the Department must be notified in writing within ten (10) days of the exceedance. [COHRAR § 3.5.4]

5. <u>Electronic Reporting to EPA</u>

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 MMMM § 63.3920]

(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) The five-(5)-year records retention requirement specified in I.B.4. of this Permit notwithstanding, the results of the most recent testing performed at each emission point shall be kept on file and shall be available to the Department for inspection at all reasonable times. [COHRAR § 1.9.1]

(B) Records of material throughput shall be maintained for use in quantifying emissions of VOC and VHAP. Accurate and understandable records of consumption of VOCs, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information: [COHRAR §§ 1.9.1, 3.5.4; Part 14.5

Subpart MMMM § 63.3930]

(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 TO. 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.

(C) The minimum operational temperature of the combustion chamber of the thermal oxidizer 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 years following the data recording. [COHRAR §§ 1.9.1, 3.5.4]

(D) The thermal oxidizer must have an audible alarm or easily detectable signal which will provide a warning when the combustion chamber temperature decreases to less than the established minimum operational temperature. The origin and detectability of the audible or other signal shall be such that it can be readily heard or detected by the operator or another person who will immediately determine the cause and take appropriate action to correct any problem and/or record the malfunction/reason. The time, duration, cause(s), and the action(s) taken for any operating temperature less than the established minimum shall be recorded in a form suitable for inspection. These records shall be maintained for at least five years. [COHRAR § 3.5.4]

(E) A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer. 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 will be recorded for all system operations and the recordings will be maintained in a form suitable for inspection for a period of five years. [COHRAR §§ 1.9.1, 3.5.4]

(F) When any bypassing of the thermal oxidizer (TO) occurs, the time, date, or duration, estimated VOC emissions, and equipment process(es) bypassed will be recorded. Records will be maintained of any malfunction or non-operation of the TO which results in an increase in the VOC emissions from any or all process equipment. These records will be maintained in a form suitable for inspection for a period of five years. [COHRAR §§ 1.9.1, 3.5.4]

(G) Not later than the 30th day of the month following each calendar month, compliance with all provisions in this Permit shall be determined. Records of these monthly compliance determinations shall be maintained for a minimum of five (5) years. [COHRAR § 3.5.4]

III.B. Miscellaneous Natural Gas-fired Combustion Sources

1. <u>Emission Limitations</u>

(A) Emission of particulate matter (PM) shall not exceed 0.0005 lb/MMBtu from any natural gas-fired combustion unit (OSP-3-NG, except for OSP-3-NG1 (HVAC)). Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack. [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 (OSP-3-NG, except for OSP-3-NG1 (HVAC)). Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions ≤ 10 micrometers from the stack. [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 (OSP-3-NG, except for OSP-3-NG1 (HVAC)). Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions ≤ 2.5 micrometers from the stack. [COHRAR §§ 1.10.2, 3.5.4]

(D) Emissions of particulate matter 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 lb//million Btu and H is the heat input in millions of Btu/hr. [COHRAR § 6.3.1]

(E) The stack(s) associated with this (these) source(s) 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 take any necessary corrective actions. [COHRAR §§ 1.10.2, 3.5.4]

(F) Emissions of nitrogen oxides (NO_x) from the process ovens and thermal oxidizer shall not exceed 0.05 lb/MMBtu of heat input. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of nitrogen oxides emissions from the stack. [COHRAR §§ 1.10.2, 3.5.4]

(G) Emissions of nitrogen oxides (NO_x) from the boilers shall not exceed 0.1 lb/MMBtu of heat input. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of nitrogen oxides emissions from the stack. [COHRAR §§ 1.10.2, 3.5.4]

2. <u>Work Practice Requirements</u>

(A) Natural gas shall be the only fuel used in the combustion equipment with the exception of diesel-fueled emergency fire pump(s), diesel-fueled emergency generator engines, and gasoline engines. [COHRAR § 3.5.4]

(B) The permittee shall utilize good work practices that are practically and economically feasible that reasonably minimize emissions of NOx and other pollutants in all operations. Periodic maintenance of each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-3-NG) will occur at a minimum as suggested by the manufacturer of the unit. [COHRAR § 3.5.4]

(C) A tune-up shall be performed on the Metal Parts E-Coat Boiler (Unit OSP-4-NG4) every five (5) years. The first five-(5)-year tune-up must be performed no later than sixty-one (61) months after initial startup and subsequent tune-ups performed no more than sixty-one (61) months after the previous tune-up. Tune-ups may be delayed until the next scheduled or unscheduled unit shutdown but must be conducted at least once every seventy-two (72) months. As a minimum, the scope of the tune-up shall include the following: [COHRAR § 3.5. 4, Part 14.5, Subpart DDDDD §§ 63.7500, 63.7540]

(1) Inspect the oven, and clean or replace any components as necessary.

(2) Inspect the flame pattern and adjust 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, the Metal Parts E-Coat Oven (Unit OSP-3-NG2) shall be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions. [COHRAR § 3.5.4, Part 14.5, Subpart DDDDD § 63.7500]

3. <u>Monitoring Requirements</u>

When operating, each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-3-NG) 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 years following the date of such measurement. [COHRAR § 3.5.4]

4. <u>Reporting Requirements</u>

(A) 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]

(1) The natural gas consumption, emissions and compliance information identified in III.E.5(A) below.

(2) Any deviation from the emission limitations or work practice requirements of this Permit.

(B) An initial compliance report covering the period beginning on the compliance date that is specified for the Metal Parts E-Coat Boiler (Unit OSP-4-NG4) 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 five (5) years after the compliance date that is specified for the boiler in §63.7495. Subsequent five-(5)-year compliance reports must cover the five-(5)-year periods from January 1 to December 31. The compliance report shall include the minimum information and be submitted as follows: [COHRAR Part 14.5, Subpart DDDDD § 63.7550]

(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 a five-(5)-year tune-up. Include the date of the most recent burner inspection if it was not done on a five-(5)-year period and was delayed until the next scheduled or unscheduled unit shutdown.

(6) 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.

(7) 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.

(C) 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. [COHRAR Part 14.5, Subpart DDDDD § 63.7550(h)]

(D) 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.

(E) The compliance reports must be postmarked or submitted no later than January 31.

5. <u>Record-keeping Requirements</u>

(A) Accurate and understandable records of consumption of natural gas, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information: [COHRAR §§ 1.9.1, 3.5.4]

(1) Usage of natural gas by this unit: Natural Gas Fired Unit(s) (Unit OSP-3-NG) 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 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) A logbook of the monthly visible observations required in proviso III.B.3 shall be retained for at least five years and available for inspection upon request. This logbook 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 the boiler tune-ups performed shall be maintained which includes, as a minimum, the following information: [COHRAR Part 14.5, Subpart DDDDD § 63.7555]

(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, and oxygen (O_2) 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 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.C. Diesel-fueled Emergency Engines [Three (3) Diesel-Fueled Emergency Generator Engines (Units OSP-3-EG1, OSP-3-EG2 and OSP-3-EG3) and One (1) Diesel-Fueled Emergency Fire Pump Engine (Unit OSP-3-FP1)]

1. <u>Emission Limitations</u>

(A) Each 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(a) through (d); COHRAR Part 14.5 Subpart ZZZZ, § 63.6590(c)(1)]

(B) The stacks associated with these sources 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 the stack, the operator shall investigate the cause and make any necessary corrective actions. [COHRAR §§ 1.9.2, 3.5.4]

(C) Only Ultra Low Sulfur Diesel Fuel (15 ppm) with a sulfur content of 15 ppm or less may be used as fuel in the diesel-fueled emergency engines. [COHRAR § 3.5.4]

2. <u>Work Practice Requirements</u>

(A) Each diesel-fired engine must be operated and maintained in accordance with the manufacturers' recommendations. [COHRAR Part 13.2 Subpart IIII, § 60.4211(a)(1); COHRAR Part 14.5 Subpart ZZZZ, § 63.6625(e)]

(B) As a minimum, the following maintenance schedule shall be utilized for the diesel-fueled emergency engines: [COHRAR § 3.5.4, Part 14.5 Subpart ZZZZ, § 63.6603(a), Table 2d.4]:

(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 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 the engine's time spent at idle and minimize the 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. <u>Monitoring Requirements</u>

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

4. Operational Limitations

(A) Each diesel-fueled engine is to be operated as an emergency stationary RICE (Reciprocating Internal Combustion Engines) as defined in § 63.6675. [COHRAR § 3.1.2(g) and Part 13.2 Subpart IIII, §§ 60.4211(f), 60.4219; COHRAR Part 14.5 Subpart ZZZZ, §§ 63.6640(f), 63.6675]

(B) The following operational limitations apply to these unit(s): . [COHRAR Part 13.2 Subpart IIII, § 60.4211(f); COHRAR Part 14.5 Subpart ZZZZ, § 63.6640(f)]

(1) There is no time limit on the use of the emergency engines in emergency situations.

(2) Each emergency engine may be operated for a maximum of one-hundred (100) hours per calendar year for maintenance checks and readiness testing, 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.C.4(3) below counts as part of the one-hundred (100) hours per calendar year allowed by this paragraph III.C.4(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.C.4(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 as 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. <u>Record-keeping Requirements</u>

(A) Records of all maintenance performed on each engine pursuant to the requirements of paragraph III.C.2 above shall be maintained in a form suitable for inspection. [COHRAR Part 13.2 Subpart IIII § 60.4214(a)(2)(ii); 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.C.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.C.4 above have not been violated. [COHRAR § 1.9.1 and Part 13.2 Subpart IIII, § 60.4214(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. [COHRAR §§ 1.9.1, 3.5.4]

III.I. 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 record-keeping 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

Emissions from the cooling tower, 550-gallon diesel tank and dry ice blast-cleaning process are insignificant. Emissions from the evaporators in the boiler building are trivial.

VI. COMPLIANCE SCHEDULE

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

Effective Date of Permit