

AIR QUALITY PERMIT

Permit No.
3711-051-0219-P-01-0

Effective Date
June 12, 2003

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

DaimlerChrysler Manufacturing International LLC
190 B Crossroads Parkway
Savannah, Georgia 31422

is issued a Permit for the following: The construction and operation of a light-duty and medium-duty truck assembly plant. See Appendix for list of emissions units and associated control devices.

Facility location: NE Intersection of Hwy I-95&I-16 or Dean Forest Road & Pine Barren Road
Pooler, Georgia 31322
Chatham County

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in the application No. 14178, received on December 18, 2002, and supporting data entered therein or attached thereto, or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **42** pages, which pages are a part of this Permit.

Director
Environmental Protection Division

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

i

Table of Contents

PART 1.0	GENERAL CONDITIONS.....	1
PART 2.0	REQUIREMENTS PERTAINING TO THE ENTIRE PLANT	3
2.1	Plant-Wide Federal Regulatory Requirements & Emission Standards/Limits	3
2.2	Plant-Wide State Regulatory Requirements & Emission Standards/Limits	3
PART 3.0	REQUIREMENTS FOR EMISSION UNITS.....	4
3.1	Equipment Federal PSD Rule Requirements & Emission Standards	4
3.2	Equipment Federal NSPS Rule Requirements & Emission Standards	8
3.3	Equipment Federal NESHAP/MACT Rule Requirements & Emission Standards	9
3.4	Equipment State/SIP Rule Requirements & Emission Standards	12
3.5	Equipment Federal and State Rule Requirements For Emission Control System	16
PART 4.0	REQUIREMENTS FOR TESTING.....	17
4.1	General Testing Requirements.....	17
4.2	Specific Testing Requirements.....	18
4.3	Initial Performance Testing Requirements.....	20
PART 5.0	REQUIREMENTS FOR MONITORING (Related to Data Collection).....	22
5.1	General Monitoring Requirements	22
5.2	Specific Monitoring Requirements	22
5.3	Record Keeping and Reporting Requirements (associated with Specific Monitoring Requirements)	24
PART 6.0	RECORD KEEPING, COMPLIANCE DEMONSTRATION & REPORTING.....	27
6.1	General Record Keeping and Reporting Requirements	27
6.2	Specific Record Keeping and Reporting Requirements.....	32
PART 7.0	OTHER SPECIFIC REQUIREMENTS	40
7.1	Alternative Requirements.....	41
APPENDIX – Permitted Major Source Equipment List		

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 1 of 41

PART 1.0 GENERAL CONDITIONS

- 1.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director.
[391-3-1-.03(4)]
- 1.2 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.
[391-3-1-.02(2)(a)10]
- 1.3 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.
[391-3-1-.03(1) through (8)]
- 1.4 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the Rules adopted pursuant to that Act.
[391-3-1-.02(2)(a)3]
- 1.5 Where more than one condition in this Permit applies to an emission unit and/or the entire plant, each condition shall apply and the most stringent condition shall take precedence.
[391-3-1-.02(2)(a)2]
- 1.6 Terms not otherwise defined in this Permit shall have the meaning assigned to such terms in the referenced regulation.
[391-3-1-.01]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 2 of 41

-
- 1.7 Records of all data, reports, notifications, and calculations shall be maintained in an order suitable for inspection for a period of five (5) years from the date of creation.
[391-3-1-.02(6)(b)1(i)]

 - 1.8 In VOC emission compliance determination(s) involving the exclusion of water presented, organic compounds not defined as VOC's, i.e. "exempt compounds/solvents", shall be treated as water.
[391-3-1-.02(2)(a)6(iii)]

 - 1.9 This permit shall become invalid if construction is not commenced within 18 months after the effective date of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Director may extend the 18-month period upon a satisfactory showing that an extension is justified.
[40 CFR 52.21 – PSD]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 3 of 41

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE PLANT

2.1 Plant-Wide Federal Regulatory Requirements & Emission Standards/Limits

- 2.1.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the entire plant, volatile organic compounds (VOC) in amounts exceeding 859 tons during any twelve (12) consecutive months.
[40 CFR 52.21 - PSD]
- 2.1.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the entire plant, carbon monoxide (CO) in amounts equal to or exceeding 100 tons during any twelve (12) consecutive months
[40 CFR 52.21 – PSD Avoidance]
- 2.1.3 The total quantity of the fuel oil(s), including diesel fuel oil, burned shall not exceed one million gallons during any twelve (12) consecutive months.
[40 CFR 52.21 – PSD Avoidance]
- 2.1.4 The Permittee shall comply with all applicable provisions of 40 CFR 60 Subpart A – “General Provisions.”
[40 CFR 60 Subpart A]
- 2.15 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart A – “General Provisions.”
[40 CFR 63 Subpart A]

2.2 Plant-Wide State Regulatory Requirements & Emission Standards/Limits

- 2.2.1 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission that would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or a standard based on the pollutant concentration in gases discharged into the atmosphere.
[391-3-1-.03(2)(c)]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 4 of 41

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

3.1 Equipment Federal PSD Rule Requirements & Emission Standards

- 3.1.1 The Permittee shall not cause, let, permit, or allow the emissions of nitrogen oxides (NO_x) from the 1,100 HP hot water generators (HW01, HW02 and HW03) and the 600 HP hot water generators (HW04 and HW05) to exceed:
[40 CFR 52.21 – PSD]
- a. 30 ppm at 3% oxygen (O₂) on dry basis when the hot water generators are burning natural gas; and
 - b. 0.178 pounds per million BTU of heat input while the hot water generators are burning fuel oil.
- 3.1.2 Except for Emergency Generators EG01 and EG02, the Permittee shall only burn natural gas as defined by ASTM D1835 in all fuel combustion units at this facility. The Permittee may also burn fuel oil that complies with Condition 3.1.3 in the 1,100 HP hot water generators (HW01, HW02, and HW03) and the 600 HP hot water generators (HW04 and HW05).
[40 CFR 52.21 – PSD, and 391-3-1-.03(2)(g)(subsumed)]
- 3.1.3 The Permittee shall only burn fuel oil(s) that complies with the specifications for fuel oil No. 1 or 2, as defined by the ASTM D396 in the 1,100 HP hot water generators (HW01, HW02, and HW03, and the 600 HP hot water generators (HW04 and HW05).
[40 CFR 52.21 – PSD, 40 CFR 60 Subpart Dc, and 391-3-1-.03(2)(g)(subsumed)]
- 3.1.4 The Permittee shall not discharge, or cause the discharge, into the atmosphere from any process equipment in the paint shop at this facility, any gases, which contain particulate matter (PM) in excess of 0.0015 grains per dry standard cubic foot (0.0034 grams per dry standard cubic meter). The “Process Equipment” is defined in Georgia Air Quality Control Rule 391-3-1-.02(1)(fff) as any equipment, device or contrivance for changing, melting, storing, handling, or altering chemically or physically any material, the use or existence of which may cause any discharge of air contaminants into the open air, excluding “Fuel-Burning Equipment” as defined in Georgia Air Quality Control Rule 391-3-1-.02(1)(cc).
[40 CFR 52.21 – PSD]
- 3.1.5 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the “Process Equipment” subject to Condition 3.1.4, any visible emissions, which exhibit opacity equal to or greater than twenty (20) percent.
[40 CFR 52.21 – PSD]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 5 of 41

- 3.1.6 The Permittee shall inspect and replace the dry particulate matter exhaust filters serving paint spray booths, sanding or polishing booths/stations in accordance with manufacturer recommendations or locally prepared maintenance plans.
[40 CFR 52.21 – PSD]
- 3.1.7 The Permittee shall not discharge or cause the discharge into the atmosphere from any affected electrodeposition prime coat (E-coat) facility at this plant, VOC emissions in excess of 0.04 pounds per gallon of applied coating solids (0.0048 kilograms per liter of applied coating solids) as averaged on a monthly basis.
[40 CFR 52.21 – PSD and 40 CFR 60 Subpart MM(subsumed)]
- 3.1.8 The Permittee shall not discharge or cause the discharge into the atmosphere from any affected guidecoat facility at this plant, VOC emissions in excess of 4.64 pounds per gallon of applied coating solids (0.554 kilograms per liter of applied coating solids) as averaged on a monthly basis.
[40 CFR 52.21 – PSD and 40 CFR 60 Subpart MM(subsumed)]
- 3.1.9 The Permittee shall not discharge or cause the discharge into the atmosphere from any affected monocoat facility at this plant, VOC emissions in excess of 5.12 pounds per gallon of applied coating solids (0.611 kilograms per liter of applied coating solids) as averaged on a monthly basis.
[40 CFR 52.21 – PSD and 40 CFR 60 Subpart MM(subsumed)]
- 3.1.10 The Permittee shall not discharge or cause the discharge into the atmosphere from any affected basecoat/clearcoat facility at this plant, VOC emissions in excess of 10.1 pounds per gallon of applied coating solids (1.202 kilograms per liter of applied coating solids) as averaged on a monthly basis.
[40 CFR 52.21 – PSD and 40 CFR 60 Subpart MM(subsumed)]
- 3.1.11 The Permittee shall not use or apply sealers (excluding exterior seam sealer applied after inspection and repair), underbody coatings, sound deadners and cavity waxes at this plant that have a combined VOC content in excess of 0.4pounds per gallon (0.048 kilograms per liter), excluding water, as averaged on a monthly basis.
[40 CFR 52.21 – PSD]
- 3.1.12 The Permittee shall not discharge or cause the discharge into the atmosphere from the applicator purging, body wiping and equipment cleaning process at this plant, combined VOC emissions in excess of 1.70 pounds (0.77 kilograms) per unit of the vehicle produced as averaged on a twelve consecutive month basis.
[40 CFR 52.21 – PSD]

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 6 of 41

- 3.1.13 The Permittee shall not cause, let, permit, suffer or allow the emissions of VOC from the cleaning of oil and grease stains on the body shop floor to exceed 0.1 pounds per unit of the vehicles assembled averaged over any twelve (12) consecutive month period.
[40 CFR 52.21 – PSD, and 391-3-1-.02(2)(t)]
- 3.1.14 The Permittee shall not cause, let, permit, suffer or allow the emission of VOC from solvents used to purge, flush or clean paint application systems including paint lines, tanks and applicators, unless such solvents are captured to the maximum degree feasible by being directed into containers that prevent evaporation into the atmosphere.
[40 CFR 52.21 – PSD, and 391-3-1-.02(2)(t)]
- 3.1.15 The Permittee shall not store solvents or waste solvents in drums, pails, cans or other containers unless such containers have air-tight covers which are in place at all times when materials are not being transferred into or out of the container. The solvents or waste solvents shall not be disposed of or transferred by any method, which allows the excessive evaporation of the solvent(s) into the atmosphere.
[40 CFR 52.21 – PSD and 391-3-1-.02(2)(t)]
- 3.1.16 The Permittee shall employ devices to collect the purged thinner and purged paint during the purging of paint spray applicators and associated equipment. The collection, handling and disposal of the purge thinner and purged paint shall be conducted in a manner so as to minimize emissions of VOC to atmosphere.
[40 CFR 52.21 – PSD]
- 3.1.17 The Permittee may not transfer or cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank, unless:
[40 CFR 52.21 – PSD]
- a. The tank is equipped with all of the following:
- i. A submerged fill pipe;
 - ii. A Division approved Stage I vapor recovery system that shall remain in good working condition, such as keeping the vapor return opening free of liquid or solid obstructions, and that also shall be leak tight as determined by tests conducted in accordance with test procedures as approved by the Division; and
 - iii. Vents that shall be at least 12 feet in height from the ground and shall have a Pressure/Vacuum vent valve with minimum settings of 8 ounces of pressure and 1/2 ounce of vacuum unless the facility has a CARB certified Stage II vapor recovery system where the CARB executive order explicitly states the settings for the vent valve; and

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 7 of 41

- b. The vapors displaced from the storage tank during filling are controlled by one of the following:
- i. The utilization of a vapor-tight vapor return line from the stationary gasoline storage tank(s) to the delivery vessel for each product delivery line that is connected from the delivery vessel to the storage tank(s) and a system that will ensure the vapor line(s) is connected before gasoline can be transferred into the tank(s); or
 - ii. If a manifold connects all stationary gasoline storage tanks vent lines, the utilization of a vapor tight vapor return line from a tank being filled to the delivery vessel. There should be sufficient return capacity to control vapors from all tanks being filled at the time and to prevent release of said vapors from the vent line(s) or other tank openings; or
 - iii. The utilization of a refrigeration-condensation system or a carbon adsorption system that recovers at least 90 percent by weight of the organic compounds in the displaced vapor. An application must be submitted six months prior to the construction of the refrigeration-condensation system or the carbon adsorption system for the facility to control displaced vapors with this method.

3.1.18 The Permittee may not transfer or cause or allow the transfer of any volatile organic liquid other than gasoline from any delivery vessel into any stationary storage tank greater than 4,000 gallons, unless the tank is equipped with submerged fill pipe(s).
[40 CFR 52.21 – PSD]

3.1.19 The Permittee shall comply with the following equipment design and work practice standards as they pertain to any of the cold solvent metal parts cleaners/degreasers at this facility:
[40 CFR 52.21 – PSD]

- a. Solvent cleaners shall be equipped with a cover to prevent escape of VOC during periods of non-use,
- b. Solvent cleaners shall be equipped with a device to drain cleaned parts before removal from the unit,
- c. If the solvent volatility is 0.6 psi or greater measured at 100°F, or if the solvent is heated above 120°F, then one of the following control devices must be used:
 - i. Freeboard that gives a freeboard ratio of 0.7 or greater,
 - ii. Water cover (solvent must be insoluble in and heavier than water);
 - iii. Other systems of equivalent control, such as a refrigerated chiller or carbon adsorption.
- d. Any solvent spray utilized by solvent cleaners must be in the form of a solid, fluid stream and at a pressure which will not cause excessive splashing, and

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 8 of 41

- e. All waste solvent from solvent cleaners shall be stored in covered containers and shall not be disposed of by a method to allow excessive evaporation into the atmosphere.
- 3.1.20 The Permittee shall store all the used VOC-laden cleaning materials, including shop towels and rags in covered containers immediately after use. [40 CFR 52.21 – PSD]
- 3.1.21 The Permittee shall operate each of the 1.1 MW stationary diesel generators (Emission Unit I.D. Nos. EG01 and EG02) strictly as an emergency standby power source as defined by 391-3-1-.02(2)(mmm)4.(i) of Georgia Rules for Air Quality Control. The total operating time of each of the generators shall not exceed 250 hours during any period of twelve (12) consecutive months.
[40 CFR 52.21 – PSD, and 40 CFR Part 63 Subpart B (112(g))]
- 3.1.22 Fuel oil fired in the 1.1 MW stationary diesel generators (Emission Unit I.D. Nos. EG01 and EG02) shall be diesel fuel oil and shall not contain more than 0.5 percent sulfur by weight. Diesel fuel oil means fuel oil that complies with the specifications for diesel fuel oil numbers 1-D, 2-D, Low Sulfur 1-D, or Low Sulfur 2-D as defined by the American Society for Testing and Materials (ASTM) standard D975, “Standard Specification for Diesel Fuel Oils.”
[40 CFR 52.21 – PSD, and 391-3-1-.03(2)(g)(subsumed)]

3.2 Equipment Federal NSPS Rule Requirements & Emission Standards

- 3.2.1 The Permittee shall not cause to be discharged into the atmosphere from each of the hot water generators (HW01, HW02, HW03, HW04 and HW05) any gases that exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.
[40 CFR Part 60 Subpart Dc and 391-3-1-.02(2)(d)]
- 3.2.2 The Permittee shall comply with the applicable provisions of 40 CFR 60, Subpart Kb, “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984”, for storage tanks T01, T02, T03, T10, and UT01.
[40 CFR 60 Subpart Kb]
- 3.2.3 The Permittee shall comply with the applicable provisions of 40 CFR 60, Subpart MM, “Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.”
[40 CFR 60 Subpart MM]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 9 of 41

3.3 Equipment Federal NESHAP/MACT Rule Requirements & Emission Standards

Light Duty Truck Manufacturing MACT

- 3.3.1 The Permittee shall limit combined organic HAP emissions to the atmosphere from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive application to no more than 0.036 kg/l (0.30lb/gal) of coating solids deposited during each month for all light duty trucks, as averaged on a monthly basis.
[40 CFR Part 63 Subpart B (112(g))]
- 3.3.2 The Permittee shall limit the average organic HAP emissions from all adhesives and sealer materials other than materials used as components of glass bonding systems to no more than 0.010 kg/kg (lb/lb) of adhesive and sealer material used for all light duty trucks, as averaged on a monthly basis.
[40 CFR Part 63 Subpart B (112(g))]
- 3.3.3 The Permittee shall limit the average organic HAP emissions from all deadener materials to no more than 0.010 kg/kg (lb/lb) of deadener material used for all light duty trucks, as averaged on a monthly basis.
[40 CFR Part 63 Subpart B (112(g))]
- 3.3.4 The Permittee shall develop and implement a work practice plan to minimize organic HAP emissions from storage, mixing and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations with established emission limits related to the manufacture of light duty trucks. The plan must include the following work practice standards:
[40 CFR Part 63 Subpart B (112(g))]
- a. All organic HAP containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
 - b. The risk of spills of organic HAP containing coatings, thinners, cleaning materials, and waste materials must be minimized.
 - c. Organic HAP containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
 - d. 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.
 - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 10 of 41

3.3.5 The Permittee shall develop and implement a work practice plan to minimize organic HAP emissions during cleaning of storage, mixing and conveying equipment, including minimizing organic HAP emissions from cleaning and from purging of equipment associated with all coating operations with established emission limits related to the manufacture of light duty trucks. This plan must include the following work practice standards:
[40 CFR Part 63 Subpart B (112(g))]

- a. Vehicle body wipe emissions should be addressed through one or more of the following:
 - i. The 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 percent organic HAP by weight.

- b. Coating line purging should be addressed through one or more of the techniques below:
 - i. The use of 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 solvents containing less than 1 percent organic HAP by weight.

- c. Coating systems flushing should be addressed through one or more of the techniques below:
 - i. Keeping solvent tanks closed.
 - ii. Recovering and recycling solvents
 - iii. Keeping recovered/recycled solvent tanks closed.
 - iv. Use of solvents containing less than 1 percent organic HAP by weight.

- d. Spray booth grate cleaning should be addressed through one or more of the techniques below:
 - i. Controlled burn-off.
 - ii. Rinsing with high-pressure water (in place).
 - iii. Rinsing with high-pressure water (off line).
 - iv. Use of spray-on masking or other type of masking.
 - v. Use of cleaners containing less than 1 percent organic HAP by weight.

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 11 of 41

- e. Spray booth wall cleaning should be addressed through one or more of the techniques below:
 - 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 cleaners containing less than 1 percent organic HAP by weight.
 - v. Controlled access to cleaning solvents.

- f. Spray booth equipment cleaning should be addressed through one or more of the techniques below:
 - 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 cleaners containing less than 1 percent organic HAP by weight.
 - v. Controlled access to cleaning solvents.

- g. External spray booth area cleaning should be addressed through one or more of the techniques below:
 - 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 cleaners containing less than 1 percent organic HAP by weight.
 - vi. Controlled access to cleaning solvents.

- h. Housekeeping measures not addressed above should be addressed through one or more of the techniques below:
 - 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.

3.3.6 The Permittee shall develop and implement a written startup, shutdown, and malfunction plan that addresses startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control devices used in the manufacturing of light duty trucks.

[40 CFR Part 63 Subpart B (112(g))]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 12 of 41

Miscellaneous Metal Parts & Products Coating MACT (Medium Duty Truck Manufacturing)

- 3.3.7 The Permittee shall limit combined organic HAP emissions to the atmosphere to no more than 0.23 kg/l (1.94lb/gal) of coating solids used during each month for all medium duty trucks and miscellaneous metal coating operations not covered by another Part 63 standard.
[40 CFR Part 63 Subpart B (112(g))]
- 3.3.8 The Permittee shall develop and implement a work practice plan including a monthly work practice inspection to minimize organic HAP emissions from storage, mixing and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations with established emission limits related to the manufacture of medium duty trucks and miscellaneous metal coating operations not covered by another Part 63 standard. The plan should include work practice standards similar to those required in Conditions 3.3.4 and 3.3.5.
[40 CFR Part 63 Subpart B (112(g))]
- 3.3.9 The Permittee shall develop and implement a written startup, shutdown, and malfunction plan that addresses startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control devices used in the manufacturing of medium duty trucks and miscellaneous metal coating operations not covered by another Part 63 standard.
[40 CFR Part 63 Subpart B (112(g))]

Industrial/Commercial/Institutional Boilers and Process Heaters MACT (Hot Water Generators)

- 3.3.10 The Permittee shall burn only natural gas and liquid fossil fuels other than residual oil in the hot water generators. Residual oil means crude oil, fuel oil numbers 1 and 2 that have a nitrogen content greater than 0.05 weight percent and all fuel oil numbers 4,5, and 6, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specifications for Fuel Oils."
[40 CFR Part 63 Subpart B (112(g))]

3.4 Equipment State/SIP Rule Requirements & Emission Standards

- 3.4.1. The Permittee shall not cause, let, permit, suffer or allow the emissions of VOC from the production of light duty trucks (LDT) at this plant to exceed the applicable limit(s) listed below:
[391-3-1-.02(2)(t)]
- a. 1.2 pounds of VOC per gallon of coating excluding water and exempt solvents, as a monthly weighted average, from each electrophoretic applied prime (Ecoat) operation;

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 13 of 41

- b. 15.1 pounds of VOC per gallon of applied coating solids, as a daily weighted average, from each spray prime (guide coat) operation;
- c. 15.1 pounds of VOC per gallon of applied coating solids, as a daily weighted average, from each topcoat operation;
- d. 4.8 pounds of VOC per gallon of coating delivered to the coating applicator from each final repair operation. If any coating delivered to the coating applicator contains more than 4.8 pounds of VOC per gallon of coating, the limit shall be 13.8 pounds of VOC per gallon of coating solids sprayed, as a daily weighted average.
- e. 1.0 pound of VOC per gallon of sealer, excluding water and exempt solvents, delivered to a coating applicator;
- f. 3.5 pounds of VOC per gallon of adhesive, excluding water and exempt solvents, delivered to an applicator that applies adhesives, except body glass adhesives;
- g. 6.9 pounds of VOC per gallon of cleaner, excluding water and exempt solvents, delivered to an applicator that applies cleaner to the edge of body glass prior to priming;
- h. 5.5 pounds of VOC per gallon of primer, excluding water and exempt solvents, delivered to an applicator that applies primer to the body glass or to the body to prepare the glass and body for bonding;
- i. 1.0 pound of VOC per gallon of adhesive, excluding water and exempt solvents, delivered to an applicator that applies adhesive to bond body glass to the body; and
- j. 3.5 pounds of VOC per gallon of material, excluding water and exempt solvents, for all other materials not subject to some other emission limitation stated in Conditions 3.1.13, 3.4.1, or 3.4.2.

The emission limits shall be achieved by the application of low solvent technology or a system demonstrated to have equivalent control efficiency on the basis of pounds of VOC per gallon of solids.

[391-3-1-.02(2)(t)]

- 3.4.2 The Permittee shall not cause, let, permit, suffer or allow the emissions of VOC from the use of wipe-off solvents to exceed 1.0 pound per unit of LDT produced/assembled, as a rolling 12-month average. Wipe-off solvents shall include those solvents used to clean dirt, grease, excess sealer and adhesive, or other foreign matter from the car body in preparation for painting or other production-related operation.

[391-3-1-.02(2)(t)]

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 14 of 41

- 3.4.3 The Permittee shall not cause or allow the emission of VOC from surface coating operations involved in the production of medium duty trucks (MDT) at this plant to exceed the applicable emission limit(s) listed below:
- a. 4.3 pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator that applies clear coatings. If any coating delivered to the coating applicator contains more than 4.3 pounds VOC per gallon, the solids equivalent limit shall be 10.3 pounds VOC per gallon of coating solids delivered to the coating applicator.
 - b. 3.5 pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator in a coating application system that is air-dried or forced warm air dried at temperatures up to 194°F. If any coating delivered to the coating applicator contains more than 3.5 pounds VOC per gallon, the solids equivalent limit shall be 6.67 pounds VOC per gallon of coating solids delivered to the coating applicator.
 - c. 3.5 pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator that applies extreme performance coatings. If any coating delivered to the coating applicator contains more than 3.5 pounds VOC per gallon, the solids equivalent limit shall be 6.67 pounds VOC per gallon of coating solids delivered to the coating applicator.
 - d. 3.0 pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator for all other coatings and coating application systems. If any coating delivered to the coating applicator contains more than 3.0 pounds VOC per gallon, the solids equivalent limit shall be 5.06 pounds VOC per gallon of coating solids delivered to the coating applicator.

If more than one emission limitation in this subsection applies to a specific coating, then the least stringent emission limitation shall be applied. All VOC emissions from solvent washings shall be considered in the emission limitations unless the solvent is directed into containers that prevent evaporation into the atmosphere. When demonstrating compliance with the pounds VOC per gallon limits contained in this condition, each and every coating must comply with the limit. When demonstrating compliance with the pounds VOC per gallon of coating solids delivered, the 24-hour weighted average of all coatings on a single coating line or operation must meet the limit (taking into consideration the emissions reduction achieved by control equipment.) Averaging across (coating) lines is not allowed in the determination of compliance with the emission limits. In addition to the emission limitations specified in this condition, Thermal Oxidizers C-E01, C-G01, C-G02, C-T01, and C-T02 must provide at least 90 percent VOC destruction efficiency during the production of medium duty trucks if used to demonstrate compliance with the VOC emission limits in this condition as specified in 391-3-1-.02(2)(ii)4.(iii).

[391-3-1-.02(2)(ii)]

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 15 of 41

- 3.4.4 The Permittee shall not discharge, or cause the discharge, into the atmosphere from any manufacturing processes in this facility, including thermal oxidizers, direct-heating/curing ovens and/or direct-heating air heaters, any gases which contain particulate matter in excess of the rate derived from $E = 4.1P^{0.67}$ where E equals the allowable particulate emission rate in pounds per hour and P equals the process weight input rate in tons per hour.
[391-3-1-.02(2)(e)]
- 3.4.5 The Permittee shall not discharge, or cause the discharge, into the atmosphere from any source not subject to a more restrictive opacity limit in this permit, any visible emissions that exhibit opacity equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)]
- 3.4.6 The Permittee shall not discharge, or cause the discharge, into the atmosphere from fuel-burning equipment including the hot water generators Nos. HW01, HW02, HW03, HW04 and HW05, any gases which contain fly ash and/or other particulate matter in excess of the rate derived from $P = 0.5\left(\frac{10}{R}\right)^{0.5}$ where P equals the allowable weight of emissions of fly ash and/or other particulate matter in pounds per million BTU heat input and R equals heat input of the boiler in million BTU per hour.
[391-3-1-.02(2)(d)(2)(ii)]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 16 of 41

3.5 Equipment Federal and State Rule Requirements For Emission Control System

- 3.5.1 The Permittee shall, except during periods of startup, shutdown or malfunction as specified in Georgia Rule 391-3-1-.02(2)(a)(7), operate the thermal oxidizer(s) serving the coating operation(s)/ process(es) using the same operating parameters as those used during the most recent Division approved compliance performance test(s). The Permittee shall also, except during periods of startup, shutdown or malfunction as specified in Georgia Rule 391-3-1-.02(2)(a)(7), maintain the burner temperature set point(s) at or greater than that used during the most recent Division approved compliance performance test(s) of the thermal oxidizer(s).
[391-3-1-.02(2)(a)10]
- 3.5.2 The Permittee shall, except during periods of startup, shutdown or malfunction as specified in Georgia Rule 391-3-1-.02(2)(a)(7), operate the air pollutant capture system(s) serving the control system(s) in such a way that the capture efficiency demonstrated in the most recently Division approved performance test is achieved during all periods of operation of any air pollutant control system(s) as required by the Permit.
[391-3-1-.02(2)(a)10]
- 3.5.3 A critical spare parts inventory for control equipment including measuring device(s) and/or monitoring system(s) shall be maintained by the Permittee as necessary. Critical spare parts includes those which are most probable to fail under normal conditions of the control equipment operation and which can be practically inventoried and installed by the Permittee.
[391-3-1-.02(2)(a)7]
- 3.5.4 The Permittee shall maintain the wet orifice scrubbers (C-GB1, C-GB2, C-BB1, C-BB2, C-CB1, C-CB2) serving the guidecoat and topcoat paint spray booths (GB01, GB02, BB01, BB02, CB01, CB02) in accordance with a locally prepared maintenance plan. The maintenance plan shall include information necessary for the proper operation of the wet orifice scrubbers such as manufacturer's recommended water flow rates, water depths, inspection and/or maintenance/clean-up requirements. The Permittee shall keep inspection and maintenance records for inspection and submission to the Division and to the EPA. These records shall be maintained for at least five (5) years following the date of entry.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 17 of 41

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

- 4.1.1. The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Environmental Protection Division (“Division”). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.
[391-3-1-.02(6)(b)1(i)]
- 4.1.2. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
[391-3-1-.02(3)(a)]
- 4.1.3. Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants. Unless specified otherwise, the methods for the determination of compliance with the emission limits/standards in this Permit are as follows:
- a. Method 1 for the determination of sample point locations;
 - b. Method 2 for the determination of stack gas flow rate;
 - c. Method 3 or 3A for the determination of stack gas molecular weight;
 - d. Method 4 for the determination of stack gas moisture;
 - e. Method 5 for the determination of particulate matter emissions;
 - f. Method 7 and/or 7E for the determination of nitrogen oxides emissions;
 - g. Method 9 and the procedures contained in Section 1.3 of the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants for the determination of opacity;
 - h. Method 19, when applicable, for the conversion of particulate matter concentrations and nitrogen oxide concentrations (i.e. grams/dscf for PM and ppm for NO_x) as determined using other methods specified in this section;
 - i. Method 24 for the determination of the volatile matter content, water content, density, volume solids, and weight solids of surface coatings, solvents and other VOC materials;

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 18 of 41

- j. Method 25 or 25A for the determination of total gaseous nonmethane organic emissions as carbon;
- k. Method 204 for criteria for and verification of a permanent or temporary total enclosure;
- l. Method 300 and the procedures contained in Section 1.3 of the Division's Procedures for Testing and Monitoring Sources of Air Pollutants for the determination of the transfer efficiency of coating application;
- m. Method 311 for the determination of HAP content of surface coatings, solvents and other VOC materials;
- n. EPA-450/3: Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii), 391-3-1-.02(3)(a) & 391-3-1-.02(6)(b)1(i)]

4.2 Specific Testing Requirements

- 4.2.1 Within 60 days of written notification by the Division, the Permittee shall obtain a sample(s) of any VOC material(s) subject to a BACT, NSPS, and/or state emission limit, have the sample(s) analyzed for VOC content in accordance with Method 24, and report the results of the analysis to the Division.

[PSD, NSPS, 391-3-1-.02(3)(a), 391-3-1-.02(2)(t) & 391-3-1-.02(2)(ii)]

- 4.2.2 Within 60 days of written notification by the Division, the Permittee shall obtain a sample(s) of any VOC wastes to be transported off plant property, have the sample(s) analyzed for VOC content in accordance with Method 24, and report the results of the analysis, in the units of the standard, to the Division.

[PSD, NSPS, 391-3-1-.02(3)(a), 391-3-1-.02(2)(t) & 391-3-1-.02(2)(ii)]

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 19 of 41

4.2.3 Within 90 days of the introduction into this facility of a new material whose VOC and/or solids content and/or density has not been determined, recorded and/or reported as required by this Permit and/or applicable state rule(s), the Permittee shall submit to the Division evidence that the material is in compliance with any applicable VOC limit and/or standards. Such evidence can be comprised of a Method 24 analysis of the material or a material safety data sheet or product data sheet which contains sufficient information such that the VOC content of the material, in pounds per gallon of the material excluding water and exempt solvents, can be determined. Testing of compliance with the VOC emission limits shall be conducted by sampling and analysis of the materials in accordance with EPA Method 24 or by submittal of the formulation data of the materials provided by the suppliers of the materials. The Permittee shall report the results of the analysis to the Division. In case of an inconsistency between the EPA Method 24 results and the formulation data, the EPA Method 24 results shall govern.

[BACT, NSPS, 391-3-1-.02(3)(a) and 391-3-1-.02(2)(t)]

4.2.4 Within 60 days of written notification by the Division, the Permittee shall conduct a performance test(s) to update the following system parameter(s) as required:

- a. The destruction efficiency of a specified thermal oxidizer(s);
- b. The capture efficiency of a specified VOC control system(s);
- c. The transfer efficiency of a specified coating application method(s) being used;
- d. The NO_x emissions from a specified fuel combustion unit/source;
- e. The PM emissions from a specified process unit/source; and
- f. The visible emissions from a specified source.

The performance test(s) shall be conducted and data reduced in accordance with the conditions and requirement in this Permit and in pertinent State and/or Federal rules. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any of the tests to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines. The report of the tests shall be submitted to the Division within sixty (60) days of the completion of testing.

[PSD, NSPS, 391-3-1-.02(2)(t) & 391-3-1-.02(2)(ii) & 391-3-1-.02(3)(a)]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 20 of 41

4.3 Initial Performance Testing Requirements

4.3.1 Within 60 days after achieving the maximum firing rate at which the unit(s) will be operated but no later than 270 days of initial start-up of the unit(s), the Permittee shall conduct initial performance tests to determine the NO_x emissions from the following fuel-combustion units:
[PSD]

- a. One of the 1,100 HP hot water generators (HW01, HW02 or HW03). Separate performance tests shall be conducted while firing natural gas and while firing fuel oil.
- b. One of the 600 HP hot water generators (HW04 or HW05). Separate performance tests shall be conducted while firing natural gas and while firing fuel oil.

4.3.2 Within 60 days after achieving the maximum saleable vehicle production rate but no later than 270 days of the initial start-up of saleable vehicle surface coating operations, the Permittee shall conduct initial performance tests to determine the PM emissions from the following process units:
[PSD & 391-3-1-.02(2)(e)]

- a. Exhaust stack(s) of one of the guidecoat spray booths;
- b. Exhaust stack(s) of one of the basecoat/monocoat spray booths;
- c. Exhaust stack(s) of one of the clearcoat spray booths;
- d. Exhaust stack(s) of one of the spot repair booths;
- e. The e-coat sanding deck/station exhaust stacks; and
- f. One of the sealant process exhaust Stack(s)

The tests shall establish, as applicable, the value(s) or working range(s) of any operating parameter(s) of any associated pollution control device(s)/system(s) which is subject to any of the monitoring requirements in this Permit. The value(s) or working range(s) of any control device operating parameters established during the test shall also serve as the value(s) or working range(s) for the rest of the units in the same group as itemized in this condition.

4.3.3 Within 60 days after achieving the maximum saleable vehicle production rate at which the facility will be operated but no later than 180 days of the initial start-up of saleable vehicle surface coating operations, the Permittee shall conduct initial performance tests to determine the following system parameters:
[PSD, NSPS Subpart MM, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t) & 391-3-1-.02(2)(ii)]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 21 of 41

- a. The VOC destruction efficiencies of each of the thermal oxidizers (C-EO1, C-GO1, C-GO2, C-TO1 and C-TO2). During each performance test, the Permittee shall measure and record the combustion chamber temperature of the thermal oxidizer using the continuous temperature monitoring system required by condition 5.2.1.a and determine the average combustion chamber temperature during the performance test.;
 - b. The oven/booth VOC emission split(s), i.e. the mass ratio(s) between the topcoat VOC captured by the oven(s) then sent to the oxidizers (C-GO1, C-GO2, C-TO1, and C-TO2) and the total amount of the topcoat VOC used/released from the coating operations (GO01, GO02, TO01, and TO02) during the same testing period(s); and
- 4.3.4 Within 60 days after achieving the maximum saleable vehicle surface coating production rate of light duty trucks at which the facility will be operated but no later than 180 days after the initial startup of saleable vehicle surface coating production of light duty trucks, or 24 months after initial startup of saleable vehicle surface coating production of medium duty trucks, whichever comes first, the Permittee shall conduct initial performance tests to determine the transfer efficiencies of the guidecoat, basecoat/clearcoat and monocoat processes. Until such time the results of the transfer efficiency testing are apparent the Permittee will use transfer efficiencies as indicated in 40 CFR Part 60 Subpart MM.

Should production rates increase above the rates at which the acceptable performance tests were made or should general ventilation changes be made to the collection system, the Division may require that the thermal oxidizer(s) be tested for compliance at a higher production rate or different ventilation design.

- 4.3.5 All the initial performance tests shall be conducted and data reduced in accordance with the conditions and requirement in this Permit and in pertinent State and/or Federal rules. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any of the tests to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines. The report of the tests shall be submitted to the Division within sixty (60) days of the completion of testing. [PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(e), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii) & 391-3-1-.02(3)(a)]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 22 of 41

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.1 General Monitoring Requirements

- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1]

5.2 Specific Monitoring Requirements

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. The records shall be retained for at least five (5) years following the date of entry.
[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t) & 391-3-1-.02(2)(ii)]
- a. The combustion chamber temperature of thermal oxidizers (C-EO1, C-GO1, C-GO2, C-TO1, and C-TO2) serving any on-going surfacing coating operation(s) at an accuracy of $\pm 0.75\%$ of the temperature being measured expressed in degrees Fahrenheit or $\pm 4.5^\circ\text{F}$, whichever is greater. The temperature measurement device shall be equipped with a recording device so that a permanent record is produced. During any period during which the temperature continuous monitoring and recording system is inoperative, the Permittee shall manually measure and record the combustion chamber temperature at least once every 15 minutes of surface coating operation.
- 5.2.2 The Permittee shall conduct or cause to conduct visual inspections of water flow through each of the wet orifice scrubbers (C-GB1, C-GB2, C-BB1, C-BB2, C-CB1, C-CB2) serving the guidecoat and topcoat paint spray booths (GB01, GB02, BB01, BB02, CB01, CB02) once per shift. The results of the inspection shall be recorded in a permanent form suitable and available for inspection by the Division.
[PSD, 391-3-1-.02(2)(b) & 391-3-1-.02(2)(e)]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 23 of 41

- 5.2.3 The Permittee shall perform monthly inspections of solvent parts cleaners/degreasers to ensure compliance with the design and work practice standards of Condition 3.1.19. Inspection reports shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.
[391-3-1-.02(6)(b)1]
- 5.2.4 The Permittee shall perform monthly inspections to ensure compliance with the work practice standards of Conditions 3.1.14, 3.1.15, 3.1.16, and 3.1.20. Inspection reports shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.
[PSD, 391-3-1-.02(2)(t) and 391-3-1-.02(6)(b)1]
- 5.2.5 The Permittee shall monitor the emissions of nitrogen oxides (NO_x) from hot water generators (HW01, HW02, HW03, HW04, and HW05) once per calendar quarter while burning natural gas and once again while burning fuel oil. The Permittee is not required to monitor the emissions of NO_x while burning fuel oil during quarters in which fuel oil is not combusted. The monitoring shall be conducted according to the following plan:
[PSD and 391-3-1-.02(6)(b)1]
- a. Measurements of NO_x and oxygen (O₂) concentrations shall be conducted using the procedures of Gas Research Institute Method GRI-96/0008, EPA/EMC Conditional Test Method (CTM-30) *Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers*. The measurement period shall consist of one (1) test run thirty (30) minutes in duration.
- b. The NO_x emission rate shall be computed for each run using the following equations:

For Natural Gas (to demonstrate compliance with Condition No. 3.1.1a)

$$E = C_d \frac{17.9}{20.9 - O_2}$$

E = emission rate of pollutant, (ppm @ 3% O₂)

C_d = concentration of pollutant, (ppm)

O₂ = oxygen concentration (percent by volume, dry basis)

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 24 of 41

For Fuel Oil (to demonstrate compliance with Condition No. 3.1.1b)

$$E = KC_dF_d \frac{20.9}{20.9 - O_2}$$

E = emission rate of pollutant, (lb/MMBtu)

K = Conversion factor for Nitrogen Oxides = $1.194 * 10^{-7}$ [(lb/scf)/ppm]

C_d = concentration of pollutant, (ppm)

F_d = F-Factor (Fuel F-Factor from Section 3, Method 19, or as determined by the procedures of Section 3, Method 19, dscf/MMBtu)

O₂ = oxygen concentration (percent by volume, dry basis)

- c. If any measurement of NO_x emissions from any of the fuel-combustion unit(s) being monitored exceeds the applicable limit in Condition 3.1.1, the Permittee shall make adjustments to the hot water generator(s) and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows the NO_x emissions to be less than the corresponding limit(s) specified in Condition 3.1.1. At the time that the daily measurements show that the NO_x emissions to be less than the corresponding limit(s) specified in Condition 3.1.1, subsequent measurements of NO_x emissions shall be conducted once per calendar quarter. The Permittee is not required to monitor the emissions of NO_x while burning fuel oil during quarters in which fuel oil is not combusted.
- d. A unit operating day shall be defined as a day that the unit is operated for more than 30 minutes between 12:00 midnight and the following midnight.

5.3 Record Keeping and Reporting Requirements (associated with Specific Monitoring Requirements)

- 5.3.1 In the event of any period (during actual operation) greater than or equal to three (3) hours during which the combustion chamber temperature of any thermal oxidizer(s) (C-E01, C-G01, C-G02, C-T01, and C-T02) serving a VOC/HAP emission unit(s) in operation is less than 1,400°F or greater than 50°F below the temperature determined during the most recent Division approved performance test at which the destruction efficiency of the oxidizer(s) was determined, except during periods of startup, shutdown, or malfunction, the Permittee shall submit a written report which describes the cause and duration of the episode, the corrective actions taken, and the plans to prevent future occurrences. This report must be submitted by

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 25 of 41

means that would ensure the Division's receipt of the report by no later than seven days after the occurrence.

[40 CFR 52.21 – PSD, 40 CFR Part 63 Subpart B (112(g))]

- 5.3.2 The Permittee shall maintain records of inspections and replacement of the exhaust filters serving any paint spray booth, sanding or polishing booth/station as required by Condition 3.1.6. These records shall include the filter replacement schedule as specified in the manufacturer recommendations or locally prepared maintenance plans. These records shall be maintained by the Permittee in a form suitable and available for inspection by or submission to the Division. These records shall be retained for at least five (5) years following date of entry.

[40 CFR 52.21]

Auto and Light Duty Manufacturing

- 5.3.3 The Permittee shall maintain a log for the equipment used to manufacture light duty trucks detailing the operation and maintenance of the emission capture systems, emissions abatement devices, and continuous parameter monitors (CPM) during the period between the startup date and the date when the initial emission capture system and emissions abatement device performance tests have been completed.

[40 CFR Part 63 Subpart B (112(g))]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 26 of 41

Miscellaneous Metal Parts & Products Coating

- 5.3.4 The Permittee shall maintain a log for the equipment used to manufacture medium duty trucks detailing the operation and maintenance of the emission capture systems, emissions abatement devices, and continuous parameter monitors (CPM) during the period between the startup date and the date when the initial emission capture system and emissions abatement device performance tests have been completed.
[40 CFR Part 63 Subpart B (112(g))]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 27 of 41

PART 6.0 RECORD KEEPING, COMPLIANCE DEMONSTRATION & REPORTING

6.1 General Record Keeping and Reporting Requirements

- 6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection by and submission to the Division. The records shall be retained for at least five (5) years following the date of entry.
[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii) & 391-3-1-.02(6)(b)1(i)]
- 6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions. The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.
[391-3-1-.02(6)(b)1(iv)]
- 6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by the 30th day following the end of each reporting period, July 30 and January 30, respectively, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.
[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii) and 391-3-1-.02(6)(b)1(iv)]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 28 of 41

6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each quarterly period ending March 31, June 30, September 30, and December 31 of each year. All reports shall be postmarked by the 30th day following the end of each reporting period, April 30, July 30, October 30, and January 30, respectively. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:
[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii), 391-3-1-.02(6)(b)1]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.
- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

For the purposes of 40 CFR Part 63, Subpart B (112(g)), for Industrial/Commercial/Institutional Boilers and Process Heaters," the semi-annual reports shall also include a signed statement in the Notification of Compliance Status report that indicating that only fossils fuels other than residual oil were used at the facility.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 29 of 41

- 6.1.5 Where applicable, the Permittee shall keep the following records:
[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii), and 391-3-1-.02(6)(b)1(iv)]
- a. The date, place, and time of sampling or measurement;
 - 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 such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
- 6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.
[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii), and 391-3-1-.02(6)(b)1(iv)]
- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[PSD, NSPS, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii), 391-3-1-.02(6)(b)1]
- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.
 - b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 30 of 41

- i. Any period of twelve (12) consecutive months during which the VOC emissions from the entire plant exceed 859 tons;
- ii. Any period of twelve (12) consecutive months during which the CO emissions from the entire plant exceed 100 tons;
- iii. Any results of monitoring required by condition 5.2.5 which indicate that the NO_x emissions from any of the hot water generators (HW01, HW02, HW03, HW04 or HW05) exceed the applicable limit(s) in Condition 3.1.1.a;
- iv. Any period of twelve (12) consecutive months during which the usage of fuel oil for the entire plant exceeds 1,000,000 gallons;
- v. Any period during which fuel oil is combusted that does not comply with the specifications specified in Condition 3.1.3;
- vi. Any calendar month during which the VOC emissions from the E-coat operation(s) exceeds 0.04 pounds per gallon of applied coating solids (0.0048 kilograms per liter of applied coating solids) based on monthly average;
- vii. Any calendar month during which the VOC emissions from the guide coat operation(s) exceed 4.64 pounds per gallon of applied coating solids (0.554 kilograms per liter of applied coating solids) based on monthly average;
- viii. Any calendar month during which the VOC emissions from the monocoat operation(s) exceed 5.12 pounds per gallon of applied coating solids (0.611 kilograms per liter of applied coating solids) based on monthly average;
- ix. Any calendar month during which the VOC emissions from the basecoat/clearcoat operation(s) exceed 10.1 pounds per gallon of applied coating solids (1.202 kilograms per liter of applied coating solids) based on monthly average;
- x. Any calendar month during which the combined VOC content of sealers (excluding exterior seam sealer applied after final inspection and repair), underbody coatings, sound deadeners and cavity waxes used or applied at this plant is in excess of 0.4 pounds per gallon (0.048 kilograms per liter), excluding water, based on a monthly average;
- xi. Any twelve consecutive month period during which the average combined VOC emissions from the applicator purging, body wiping and equipment cleaning process at this plant exceed 1.70 pounds (0.77 kilograms) per unit of the vehicle;
- xii. Any instance during which the emissions of VOC from the cleaning of oil and grease stains on the body shop floor exceed 0.1 pounds per unit of vehicles produced/assembled based on a 12-month rolling average;
- xiii. Any instance in which the VOC emissions from any of the specified operations exceed the applicable limit(s) in Condition 3.4.1;
- xiv. Any instance in which the rolling 12-month average VOC emissions from the use of wipe-off solvents exceed 1.0 pound per unit of LDT produced/assembled;
- xv. Any instance in which the VOC emissions from any of the surface coating operation(s) performed on MDT operations exceed the applicable limit(s) in Condition 3.4.3;

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 31 of 41

- xvi. Any period of 12-rolling/consecutive months during which the total operating time of any of the emergency standby diesel power generators exceeds 200 hours;
 - xvii. Any instance in which any of the emergency standby diesel power generators is not operated as an emergency standby power source;
 - xviii. Any instance in which the combined organic HAP emissions to the atmosphere from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive application is greater than 0.036 kg/l (0.30lb/gal) of applied coating solids deposited during each month for all light duty trucks;
 - xix. Any instance in which the organic HAP emissions from adhesives or sealer materials (other than materials used as components of glass bonding systems) is greater than 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month for all light duty trucks;
 - xx. Any instance in which the organic HAP emissions from all deadener materials is greater than 0.010 kg/kg (lb/lb) of deadener material used during each month for all light duty trucks;
 - xxi. Any instance in which the combined organic HAP emissions to the atmosphere are greater than 0.23 kg/l (1.94lb/gal) of coating solids used during each month for all medium duty trucks and miscellaneous metal coating operations not covered by another Part 63 standard.
 - xxii. Any period during which diesel fuel oil is combusted that does not comply with the specifications specified in Condition 3.1.22;
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
- i. Any three-hour period during which the combustion chamber temperature of any thermal oxidizer(s) serving an on-going surface coating operation is less than 1400°F or greater than 50°F below the value established during the most recent Division approved performance test during which the destruction efficiency of the oxidizer(s) was determined;
 - ii. Any instance in which the inspection and/or filter replacement as required by Condition 3.1.6 is not performed;
 - iii. Any instance in which the visual inspection required by Condition 5.2.2 indicates that there is no water flow in one or more of the wet orifice scrubbers and the water flow is not resumed within twelve (12) hours;
 - iv. Any instance in which the sludge cleanup necessary for proper operation of any of the wet orifice scrubbers, as required by Condition 3.5.4, is not performed;
 - v. Any instance of failure to comply with the design and work practice standards of Condition 3.1.19 as indicated by inspections required by Condition 5.2.3;

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 32 of 41

- vi. Any instance of failure to compliance with the work practice standard(s) in Conditions 3.1.14, 3.1.15, 3.1.16, and/or 3.1.20 as indicated by inspections required by Condition 5.2.4;
 - vii. Any failure to develop and implement the work practice plans described in Conditions 3.3.4, 3.3.5, and 3.3.8;
 - viii. Any failure to follow the written startup, shutdown, and malfunction plan required in Conditions 3.3.6 and 3.3.9;
 - ix. Any instance in which the facility burns residual fuel oil (as defined in Condition 3.3.10) or any fuel other than natural gas or liquid fossil fuel.
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the quarterly report required in Condition 6.1.4:
- i. Records of fuel oil supplier certifications required by condition 6.2.7. and a statement signed by a responsible official that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the quarterly period.

6.2 Specific Record Keeping and Reporting Requirements

[PSD, 40 Part 60, Subpart Dc, 40 CFR Part 60, Subpart MM, 40 CFR Part 63 Subpart B (112(g)), 391-3-1-.02(2)(g), 391-3-1-.02(2)(t), 391-3-1-.02(2)(ii), 391-3-1-.02(6)(b)1]

- 6.2.1 The Permittee shall maintain monthly usage and/or production records of all VOC containing materials for the entire plant. Separate records shall be kept for VOC containing materials that are used on each surface coating operation (EO01, GO01, GO02, TO01, or TO02) that is controlled by a thermal oxidizer (C-EO1, C-GO1, C-GO2, C-TO1, or C-TO2) . These records shall include all the information required for the calculations of the monthly plant-wide VOC emissions, such as the total weight of each VOC material used/processed and/or containerized VOC wastes disposed off-site, the VOC content of each VOC material and/or containerized VOC wastes disposed off-site (expressed as a weight percentage), the operation hours of the VOC control system(s), the overall VOC control efficiency of the VOC control system(s) approved by the Division, and periods during which the combustion chamber temperature of a Thermal Oxidizer is less than the excursion temperature defined by condition 6.1.7.c.i.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 33 of 41

- 6.2.2 The Permittee shall use the records required in Condition 6.2.1 to calculate via mass balance the monthly total VOC emissions from the entire plant for each calendar month. The Permittee shall notify the Division in writing if VOC emissions exceed 72 tons during any month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with Condition 2.1.1. All calculations should be kept as part of the monthly record required in Condition 6.2.1
- 6.2.3 The Permittee shall use the monthly VOC emission data in Condition 6.2.2 to calculate the 12-month rolling total of VOC emissions from the entire plant for each calendar month. All calculations should be kept as part of the monthly record required in Condition 6.2.1. Each 12-month rolling total shall be included in the quarterly report required by Condition 6.1.4. The Permittee shall notify the Division in writing if any of the 12-month rolling totals of VOC emissions exceeds 859 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.1.1.
- 6.2.4 The Permittee shall maintain separate monthly fuel usage and/or operating records for each type of the fuel burning units including hot water generators, process ovens, thermal oxidizers, stationary diesel generators, and/or air heaters that have different Carbon Monoxide (CO) emission factors. Separate records shall be maintained for the operating hours of each stationary diesel generator. The Permittee may calculate/prorate the monthly fuel usage for the fuel burning sources based on their heat input capacities and monthly total operating hours. All usage calculations shall be kept as part of the monthly records.
- 6.2.5 The Permittee shall use the records required in Condition 6.2.4, along with the most updated AP-42 and/or Division approved emission factor(s), to calculate the monthly total CO emissions from the entire plant for each calendar month. The Permittee shall notify the Division in writing if the calculated CO emissions exceeds 8.3 tons during any month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with Condition 2.1.2. All the calculations, including the emission factor(s) used, should be kept as part of the monthly record required in Condition 6.2.4.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 34 of 41

- 6.2.6 The Permittee shall use monthly CO emission data required by Condition 6.2.5 to calculate the 12-month rolling total of CO emissions from the entire plant for each calendar month. All calculations should be kept as part of the monthly record required in Condition 6.2.5. Each 12-month rolling total shall be included in the quarterly report specified in Condition 6.1.4. The Permittee shall notify the Division in writing if any of the 12-month rolling total CO emissions exceeds 100 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.1.2.
- 6.2.7 The Permittee shall use the records required by Condition 6.2.4 to determine the total monthly amount of fuel oil, including diesel fuel oil, combusted at the facility for each calendar month. All calculations should be kept as part of the monthly records.
- 6.2.8 The Permittee shall use the monthly fuel oil combustion data required by Condition 6.2.7 to calculate the 12-month rolling total amount of fuel oil, including diesel fuel oil, combusted at the facility. All calculations shall be kept as part of the monthly records. Each 12-month total shall be included in the quarterly report specified in Condition 6.1.4. The Permittee shall notify the Division in writing if the 12-month rolling total amount of fuel oil, including diesel fuel oil, combusted exceeds 1,000,000 gallons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with Condition 2.1.3.
- 6.2.9 For each shipment of fuel oil received, the Permittee shall obtain from the fuel supplier a certification that specifies the name of the supplier and that the oil complies with the specifications for fuel oil numbers 1 and 2 as defined in ASTM D396 – Standard Specifications for Fuel Oil. The Permittee shall notify the Division in writing when the sulfur content of any fuel oil(s) burned by any of hot water generators exceeds 0.5% by weight. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with Condition 3.1.3.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 35 of 41

- 6.2.10 The Permittee shall keep, for each of the coating operations and/or production processes/activities subject to the PSD limits (Conditions 3.1.7 through 3.1.13), Georgia State Rule 391-3-1-.02(2)(t) – VOC Emissions from Automobile and Light-Duty Truck Manufacturing (Conditions 3.4.1, 3.4.2 and 3.4.3) and/or Georgia Air Quality Control Rule 391-3-1-.02(2)(ii) – VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products (Condition 3.4.6), appropriate batch, daily and/or monthly material usage and/or operation/production records. The records shall meet the record keeping requirements in the pertinent Federal and State rules and shall allow the determination whether or not the pertinent coating operations and/or production processes/activities are in compliance with the applicable emission and/or operational limits or standards in Part 3.0 of the Permit. Such records shall include those necessary such as quantities of VOC materials used and/or containerized VOC wastes disposed; VOC, water and/or solids contents of the VOC materials as applied or delivered; VOC contents of the containerized VOC wastes shipped offsite; Division approved coating transfer efficiencies; overall control efficiency of the VOC control system(s) involved; and/or units of the vehicles produced. Material information/data from results of EPA Method 24, material safety data sheets, product data sheets, manufacturer's formulation data and/or technical bulletin are acceptable for the purpose of this condition provided that they are permissible by the pertinent rules/standards or pre-approved by the Division.
- 6.2.11 The Permittee shall use the records in Condition 6.2.10 to determine, according to the applicable compliance determination procedures/methods as specified in the pertinent Federal and/or State rules and in this Permit, that each of the coating operations and/or production processes/activities is in compliance with the applicable VOC emission and/or operational limits or standards in Part 3.0 of this Permit for the given averaging period(s). For the purposes BACT related calculations, the Permittee shall assume 100 percent capture and transfer efficiencies for the e-coat process. All the calculations used in the compliance determination should be kept as part of the record as required by Condition 6.2.10. The Permittee shall notify the Division in writing when the emissions of any air pollutants involved exceed its applicable standard. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the specific emission standard being exceeded. In addition to the notification, the Permittee shall report such instances periodically in accordance with Conditions 6.1.4 and 6.1.7.
- 6.2.12 The Permittee shall maintain records of gasoline storage tank vent design and construction to demonstrate compliance with 12 feet height requirement and records of vent valve specifications to demonstrate compliance with 8 ounce pressure and 0.5 ounce vacuum requirements as specified in Condition 3.1.17.
- 6.2.13 The Permittee shall maintain the design, construction and test records of the Stage I vapor recovery systems serving the gasoline storage tank(s) to demonstrate compliance with Condition 3.1.17.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 36 of 41

- 6.2.14 The Permittee shall maintain records of volatile organic liquid (excluding gasoline) storage tank designs to demonstrate compliance with requirements in Condition 3.1.18.
- 6.2.15 The Permittee shall use the records required by Condition 6.2.4 to determine the hours of operation of each stationary diesel generator (Emission Units EG01 and EG02). All calculations should be kept as part of the monthly records.
- 6.2.16. The Permittee shall use the monthly hours of operation date for each stationary diesel generator required by Condition 6.2.15 to calculate the 12-month rolling total hours of operation for each stationary diesel generator. All calculations shall be kept as part of the monthly records. Each 12-month total shall be included in the quarterly report specified in Condition 6.1.4.
- 6.2.17 For all diesel fuel received for combustion in stationary diesel generators (Emission Units EG01 and EG02), the Permittee shall obtain from the fuel supplier a certification that specifies the name of the supplier and that the oil complies with the specifications for diesel fuel oil numbers 1-D, 2-D, Low Sulfur 1-D, Low Sulfur 2-D as defined in ASTM D975 – Standard Specifications for Diesel Fuel Oils. The Permittee shall notify the Division in writing when the sulfur content of any diesel fuel burned by any of the stationary diesel generators exceeds 0.5% by weight. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with Condition 3.1.22
- 6.2.18 The Permittee shall maintain readily accessible records of the dimensions and an analysis showing the capacity of storage tanks T01, T02, T03, T10, and UT01. These records shall be kept for the life of the affected sources.
[40 CFR 60 Subpart Kb]
- 6.2.19 The Permittee shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for Storage Tank UT01.
[40 CFR 60 Subpart Kb]

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 37 of 41

6.2.20 To ensure the ambient impacts of the toxic air pollutant emissions from this source to meet the requirements determined following “*Guideline for the Ambient Impact of Toxic Air Pollutant Emissions*” pursuant to 391-3-1-.02(2)(a)3.(ii) of the Georgia Rules of Air Quality Control, the Permittee shall cause the exhaust gas(es) from the source(s) of the toxic air pollutant emissions to be discharged unobstructed vertically into the ambient air from a stack(s) with an exiting velocity and/or an height of no less than those presumed in the Division approved ambient impact assessment(s), provided that the stack does not exceed the applicable good engineering practice height. The Permittee shall maintain the final stack design and engineering records including calculations, testing results, and/or operating parameter/data which demonstrate compliance with the specific atmospheric dispersion scenario as predicted in the Division approved ambient impact assessment(s).

Light Duty Manufacturing MACT

6.2.21 The Permittee shall maintain monthly records of all materials used containing organic hazardous air pollutants in the manufacture of light duty trucks. These records shall include the number and type of vehicle produced, the total liters of each material used, the density of each material used (kg/liter of coating or lb/gal of coating), the organic hazardous air pollutant content of each material (mass fraction in kg/kg of coating or lb/lb of coating), the water content, the solids content of each material, and the amount and organic HAP content of material shipped off-site as waste, Division approved coating transfer efficiencies, and the overall control efficiency of the HAP control system(s) involved. All calculations used to determine compliance with Conditions No. 3.3.1, 3.3.2, and 3.3.3 should be kept as part of the monthly record. These records shall be kept available for inspection or submittal for five years from the date of record.

[40 CFR Part 63 Subpart B (112(g))]

6.2.22 The Permittee shall use the records required by Condition 6.2.21 to calculate the total monthly mass of organic HAP emissions from light duty truck manufacturing. The Permittee shall notify the Division in writing if combined organic HAP emissions from the electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive application from the manufacture of light duty trucks exceed 0.036 kg/l (0.30lb/gal) of applied coating solids used during any month, if the organic HAP emissions from adhesives or sealer materials (other than materials used as components of glass bonding systems) from the manufacture of light duty trucks exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during any month, or if the organic HAP emissions from all deadener materials from the manufacture of light duty trucks exceed 0.010 kg/kg (lb/lb) of deadener material used during any month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance in the future. These records shall be kept available for inspection or submittal for five years from the date of record.

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO.
3711-051-0219-P-01-0

PAGE 38 of 41

6.2.23 The Permittee shall submit an initial notification within 120 days from startup of the facility or within 120 days after the publication of the final rule, 40 CFR 63 Subpart III, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks," in the Federal Register whichever is later. This notification shall contain all information required by the 40 CFR 63 Subpart A - General Provisions and the final rule.
[40 CFR Part 63 Subpart B (112(g))]

Miscellaneous Metal Parts & Products Coating (Medium Duty Truck Manufacturing)

6.2.24 The Permittee shall maintain monthly records of all materials used containing organic hazardous air pollutants in the manufacture of medium duty trucks and miscellaneous metal coating operations not covered by another Part 63 standard. These records shall include the number and type of vehicle produced, the total liters of each material used, the density of each material used (kg/liter of coating), the organic HAP content of each material (mass fraction in kg organic HAP/kg of coating), the water content, the solids content of each material (volume fraction of coating solids in liters of solids per liter of coating), and the amount and organic HAP content of material shipped off as waste, and the overall control efficiency of the HAP control system(s) involved. All calculations used to determine compliance with Condition No. 3.3.7 should be kept as part of the monthly record. These records shall be kept available for inspection or submittal for five years from the date of record.
[40 CFR Part 63 Subpart B (112(g))]

6.2.25 The Permittee shall use the records required by Condition 6.2.22 to calculate the total monthly mass of organic HAP emissions from the manufacture of medium duty trucks and miscellaneous metal coating operations not covered by another Part 63 standard. The Permittee shall notify the Division in writing if organic HAP emission rate for the 12-month compliance period exceeds 0.23 kg/l (1.94lb/gal) of coating solids used during each month from the manufacture of medium duty trucks and miscellaneous metal coating operations not covered by another Part 63 standard. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance in the future. These records shall be kept available for inspection or submittal for five years from the date of record.

6.2.26 The Permittee shall submit an initial notification within 120 days from initial startup of saleable vehicle surface coating production or within 120 days after the publication of the final rule, 40 CFR 63 Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products," in the Federal Register whichever is later. This notification shall contain all information required by the 40 CFR 63 Subpart A - General Provisions and the final rule.
[40 CFR Part 63 Subpart B (112(g))]

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 39 of 41

Industrial/Commercial/Institutional Boilers and Process Heaters MACT (Hot Water Generators)

6.2.27 For each shipment of fuel oil received, the Permittee shall obtain from the supplier, certification of the type of fuel oil and the nitrogen content of the fuel oil. The fuel supplier certification shall contain the following information:

[40 CFR Part 63 Subpart B (112(g)) and 391-3-1-.02(6)(b)1]

- a. The name of the oil supplier.
- b. The location of the oil when the sample was drawn for analysis to determine the nitrogen content of the oil, specifically including whether the oil was sampled as delivered to the Permittee or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location.
- c. The nitrogen content of the oil from which the shipment came (or of the shipment itself).
- d. The method used to determine the nitrogen content of the oil.
- e. Quantity of fuel oil delivered.

6.2.28 The Permittee shall submit an initial notification within 120 days from initial startup of saleable vehicle surface coating production or within 120 days after the publication of the final rule, 40 CFR 63 Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters," in the Federal Register whichever is later. This notification shall contain all information required by the 40 CFR 63 Subpart A - General Provisions and the final rule.

[40 CFR Part 63 Subpart B (112g)]

Initial Startup Notification

6.2.29 The Permittee shall furnish the Division with a written notification as follows:

- a. The anticipated date of initial startup of this source, not more than 60 days nor less than 30 days prior to such date.
- b. The actual date of initial startup of this source within 15 days after such date.
- c. The anticipated date of initial startup of saleable vehicle surface coating production of medium-duty trucks, not more than 60 days nor less than 30 days prior to such date.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 40 of 41

- d. The actual date of initial startup of saleable vehicle surface coating production of medium-duty trucks, within 15 days after such date.
- e. The anticipated date of initial startup of saleable vehicle surface coating production of light-duty trucks, not more than 60 days nor less than 30 days prior to such date.
- f. The actual date of initial startup of saleable vehicle surface coating production, of light-duty trucks within 15 days after such date.
- g. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications and supporting documents submitted in support of this Permit. This certification shall be submitted within 180 days after startup of commercial vehicle production for a production line.

For the purposes of this Condition, “startup” shall mean the setting in operation of an affected facility for any purpose.

Submission of Sample Calculations

- 6.2.30 At least 30 days prior to initial startup of saleable vehicle surface coating production, the Permittee shall submit samples of the calculations required by conditions 6.2.2, 6.2.5, 6.2.11, 6.2.22, and 6.2.25.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 41 of 41

PART 7.0 OTHER SPECIFIC REQUIREMENTS

7.1 Alternative Requirements

[40 CFR Part 63 Subpart B (112(g))]

7.1.1. The Permittee may choose to comply with an alternative emission limit on a monthly basis as specified below. The Permittee shall notify the Division in writing at the beginning the month the facility begins operating under the alternative requirements specified in Condition Nos. 7.1.3 and 7.1.4. This notification shall be postmarked within the tenth day of the month that the Permittee is complying with the alternative requirements. If the Permittee is following Condition Nos. 7.1.3 and 7.1.4, then the Permittee shall not be subject to Condition No. 3.3.1 and Condition No. 6.1.7.b.xviii.

7.1.2. The Permittee shall also notify the Division in writing if changing from the alternative requirements in Condition Nos. 7.1.3 and 7.1.4 to the original requirements specified in Condition Nos. 3.3.1. and 6.1.7.b.xviii. This notification shall be postmarked within the tenth day of the month that the Permittee is complying with the original requirements contained in Condition Nos. 3.3.1 and 6.1.7.b.xviii. If the Permittee is complying with Condition Nos. 3.3.1 and 6.1.7.b.xviii, then the Permittee shall not be subject to Condition Nos. 7.1.3 and 7.1.4.

7.1.3 The Permittee shall limit emissions of hazardous air pollutants of:
[40 CFR 63 Subpart B]

- a. Each individual material added to the electrodeposition primer system to 1.0 percent by weight of any organic HAP.
- b. Each individual material added to the electrodeposition primer system to 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA) defined carcinogen as specified in 29 CFR 1910.1200(d)(4).
- c. Combined organic HAP emissions to the atmosphere from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive application to no more than 0.060 kg/l (0.50lb/gal) of applied coating solids used during each month.

The Permittee shall use the records required in Condition 6.2.21 and 6.2.22 as well as records of any HAPS added to the electrodeposition primer system which is an Occupational Safety and Health Administration (OSHA) defined carcinogen as specified in 29 CFR 1910.1200(d)(4) to demonstrate compliance with Condition 7.1.3. The Permittee shall notify the Division in writing if organic HAP emissions exceed the emission limits listed in (a.) through (c.) of this condition. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance in the future. These records shall be kept available for inspection or submittal for five years from the date of record.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3711-051-0219-P-01-0**

PAGE 42 of 41

- 7.1.4 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following shall excursions be reported along with the excess emissions, exceedances and excursions specified in Condition 6.1.7.
- a. Any instance in which material is added to the electrodeposition primer system that greater than 1.0 percent by weight of any organic HAP;
 - b. Any instance in which material is added to the electrodeposition primer system that greater than 0.1 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA) defined carcinogen as specified in 29 CFR 1910.1200(d)(4);
 - c. Any instance in which the combined organic HAP emissions to the atmosphere from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive application is greater than 0.036 kg/l (0.30lb/gal) of applied coating solids deposited during each month for all light duty trucks.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3719-051-0219-P-01-0**

Appendix Page 1 of 2

Permitted Major Source Equipment List

	Emission Unit ID No.	Emission Unit Description	Emission Control Unit ID No.	Emission Control Description	Stack ID No.
Body Shop	B1-W	BS#1 Welding	N/A	None	B1-F
	B1-AB	BS#1 Bonding	N/A	None	
	B2-W	BS#2 Welding	N/A	None	B2-F
	B2-AB	BS#2 Bonding	N/A	None	
Pretreatment	AC01	Alkaline Cleaner	C-AC1	Mist Eliminator	P-1 & P-2
Primer (E-Coat)	ET01	Primer (E-coat) Dip Tank	C-EO1	Thermal Oxidizer	P-3
	EO01	Oven	C-EO1	Thermal Oxidizer	P-4
	EC01	E-Coat Cooling Zone	N/A	None	P-5
	EC02	E-Coat Cooling Zone	N/A	None	P-6
Work Decks	ED01	E-Coat Sanding	C-ED1	Pad and/or Cartridge Filter	P-7
	SD01	Sealant	C-SD1	Pad and/or Cartridge Filter	P-8
Guidecoat	GB01	Spray Booth #1	C-GB1	Wet Orifice Scrubber	P-9
	GB02	Spray Booth #2	C-GB2	Wet Orifice Scrubber	P-10
	GO01	Oven#1	C-GO1	Thermal Oxidizer	P11
	GO02	Oven#2	C-GO2	Thermal Oxidizer	P12
	GC01	Cooling Zone	N/A	None	P-13
	GC02	Cooling Zone	N/A	None	P-14
Work Decks	PD01	Primer Sanding #1	C-PD1	Pad and/or Cartridge Filter	P-15
	PD02	Primer Sanding #2	C-PD2	Pad and/or Cartridge Filter	P-16
Topcoat	BB01	Basecoat Spray Booth#1	C-BB1	Wet Orifice Scrubber	P-17
	BB02	Basecoat Spray Booth#2	C-BB2	Wet Orifice Scrubber	P-18
	CB01	Clearcoat Spray Booth#1	C-CB1	Wet Orifice Scrubber	P-19
	CB02	Clearcoat Spray Booth#2	C-CB2	Wet Orifice Scrubber	P-20
	TO01	Oven#1	C-TO1	Thermal Oxidizer	P-21
	TO02	Oven#2	C-TO2	Thermal Oxidizer	P-22
	TC01	Cooling Zone	N/A	None	P-23
	TC02	Cooling Zone	N/A	None	P-24
Work Decks	ID01	Inspect/Polish/Prep/Repair	C-ID1	Pad and/or Cartridge Filter	P-25
	ID02	Inspect/Polish/Prep/Repair	C-ID2	Pad and/or Cartridge Filter	P-26
	RB01	Spot Repair #1	C-RB1	Pad and/or Cartridge Filter	P-27
	RB02	Spot Repair #2	C-RB2	Pad and/or Cartridge Filter	P-28
	RB03	Spot Repair #3	C-RB3	Pad and/or Cartridge Filter	P-29
	RB04	Spot Repair #4	C-RB4	Pad and/or Cartridge Filter	P-30
	CW01	Cavity Wax	N/A	None	P-31
	SKW1	Skid Washer	N/A	None	P-32

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**PERMIT NO.
3719-051-0219-P-01-0**

Appendix Page 2 of 2

Permitted Major Source Equipment List

	Emission Unit ID No.	Emission Unit Description	Emission Control Unit ID No.	Emission Control Description	Stack ID No.
Work Decks	PMR1	Paint Mix room	N/A	None	P-33
	WWT1	Waste Water Treatment	N/A	None	P-34
	RD01	Preparation Repair	C-RD1	Pad and/or Cartridge Filter	P-35
Test & Finish Building	F-RB1	Final Repair #1	C-RB5	Pad and/or Cartridge Filter	F-1
	F-RB2	Final Repair #2	C-RB6	Pad and/or Cartridge Filter	F-2
Assembly Shop	A1-WG	A#1 Window Glazing	N/A	None	A1-F
	A2-WG	A#2 Window Glazing	N/A	None	A2-F
	A1-BW	A#1 Under Body Wax	C-BW1	Pad and/or Cartridge Filter	A1-1
	A2-BW	A#2 Under Body Wax	C-BW2	Pad and/or Cartridge Filter	A2-1
	A1-FF	A#1 Fluids Filling	N/A	None	A1-F
	A2-FF	A#2 Fluids Filling	N/A	None	A2-F
	A1-TS	Functional Test Stand	N/A	None	A1-2
	A2-TS	Functional Test Stand	N/A	None	A2-2
Tank Farm	T01	Gasoline Tank	N/A	None	N/A
	T02	Gasoline Tank	N/A	None	N/A
	T03	Diesel Fuel Oil Tank	N/A	None	N/A
	T04	R134a Refrigerant Tank	N/A	None	N/A
	T05	Brake Fluid Tank	N/A	None	N/A
	T06	Anti-Freeze Tank	N/A	None	N/A
	T07	Screen Cleaner Tank	N/A	None	N/A
	T08	Differential Gear Oil Tank	N/A	None	N/A
	T09	Transmission Tank	N/A	None	N/A
	T10	Automatic Trans. Fluid Tank	N/A	None	N/A
	T11	Servo Oil (Power Steering) Tank	N/A	None	N/A
Utilities	HW01	1100 HP Hot Water Generator	N/A	None	U1*
	HW02	1100 HP Hot Water Generator	N/A	None	
	HW03	1100 HP Hot Water Generator	N/A	None	
	HW04	600 HP Hot Water Generator	N/A	None	
	HW05	600 HP Hot Water Generator	N/A	None	
	EG01	1.1 MW Emergency Generator	N/A	None	EG01
	EG02	1.1 MW Emergency Generator	N/A	None	EG02
	UT01	Backup #2 Fuel Oil Storage Tank	N/A	None	None

*Depending on final design specifications, U1 may consist of 1 to 5 stacks.