

# 502(b)(10) Permit for Part 70 Source

Permit Attachment No.: 3429-143-0027-V-02-1

Effective Date: January 17, 2006

**Facility Name:** **Honda Lock-America (HL-A) Co., Inc.**  
101 Murphy Industrial Boulevard  
Bremen, Georgia 30110, Haralson County

**Mailing Address:** 101 Murphy Industrial Boulevard  
Bremen, Georgia 30110

**Parent/Holding Company:** HL-A Co., Inc.

**Facility AIRS Number:** 04-13-143-00027

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 or in effect under the Act, the Permittee described above is issued a SIP Construction and Operating Permit for:

A VOC control system consisting of two rotary concentrators and a recuperative thermal oxidizer.

This modification qualifies as a Section 502(b)(10) change to the Part 70 source in accordance with Georgia Air Quality Control Rule 391-3-1-.03(10)(b)(5).

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 Rules, Chapter 391-3-1, adopted or in effect under that Act, or any other condition of this Permit and Permit No. 3429-143-0027-V-02-0. Unless modified or revoked, this Permit expires upon issuance of the next Part 70 Permit for this source.

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 Application No. TV-16417 dated October 5, 2005; any other applications upon which this Permit or Permit No. 3429-143-0027-V-02-0 are based; 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 7 page(s), which pages are a part of this Permit, and which hereby become part of Permit No. 3429-143-0027-V-02-0.

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Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION**

**1.3 Process Description of Modification**

HLA plans to install a VOC control system consisting of two rotary concentrators and a recuperative thermal oxidizer (grouped as one Air Pollution Control Device ID No. RCO1) to control VOC emissions from paint booths PB01, PB02, and PB03. The control system will have an inlet capacity of 100,000 ACFM into the concentrators. The exhaust from the adsorption side of the concentrators and the exhaust from the oxidizer will be vented through one common stack.

**PART 3.0 REQUIREMENTS FOR EMISSION UNITS**

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

**3.1.1 Updated Emission Units Table**

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PB01	Primer Surface Coating Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 2.1.2, 3.2.1, 3.4.1, 3.4.2, 3.5.1, 4.2.1 through 4.2.4, 5.2.1 through 5.2.4, 6.2.1 through 6.2.12	RCO1	Concentrators and recuperative thermal oxidizer
PBO2	Base Coat Surface Coating Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 2.1.2, 3.2.1, 3.4.1, 3.4.2, 3.5.1, 4.2.1 through 4.2.4, 5.2.1 through 5.2.4, 6.2.1 through 6.2.12	RCO1	Concentrators and recuperative thermal oxidizer
PB03	Top Coat Surface Coating Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 2.1.2, 3.2.1, 3.4.1, 3.4.2, 3.5.1, 4.2.1 through 4.2.4, 5.2.1 through 5.2.4, 6.2.1 through 6.2.12	RCO1	Concentrators and recuperative thermal oxidizer

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

**3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

- 3.5.1 The Permittee shall replace the concentrator bed material within 90 days after any performance test that indicates that the overall VOC control efficiency of RCO1 is less than 86 percent.  
[391-3-1-.03(2)(c)]

**PART 4.0 REQUIREMENTS FOR TESTING**

**4.1 General Testing Requirements**

- 4.1.4 The following test methods shall be used in conjunction with the methods specified in Condition 4.1.3 in the testing required by Conditions 4.2.1 through 4.2.4:
- a. Method 25 for determination of total gaseous nonmethane organic emissions as carbon.
  - b. Method 204 for verification of a permanent total enclosure.

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.

[391-3-1-.02(3)(a)]

## 4.2 Specific Testing Requirements

- 4.2.1 Within 180 days after startup of RCO1, the Permittee shall conduct performance tests on RCO1 to determine the overall VOC control efficiency. The Permittee shall test the combined flow upstream of the concentrators and the combined outlet flow from both the oxidizer and the concentrators. During the test(s) the Permittee must monitor and record: (1) the amount of VOC-containing material applied in each booth; (2) the parameters specified in Conditions 5.2.1 and 5.2.2.  
[391-3-1-.02(3)(a)]
- 4.2.2 After the initial performance test required by Condition 4.2.1, the Permittee shall conduct performance tests on RCO1 to determine the overall VOC control efficiency at a frequency of at least once every 36 months. The Permittee shall test the combined flow upstream of the concentrators and the combined outlet flow from both the oxidizer and the concentrators. During the test(s) the Permittee must monitor and record: (1) the amount of VOC-containing material applied in each booth; (2) the parameters specified in Conditions 5.2.1 and 5.2.2.  
[391-3-1-.02(3)(a)]
- 4.2.3 Within 180 days after any occasion that the concentrator bed material is replaced, the Permittee shall conduct performance tests on RCO1 to determine the overall VOC control efficiency. The Permittee shall test the combined flow upstream of the concentrators and the combined outlet flow from both the oxidizer and the concentrators. During the test(s) the Permittee must monitor and record: (1) the amount of VOC-containing material applied in each booth; (2) the parameters specified in Conditions 5.2.1 and 5.2.2.  
[391-3-1-.02(3)(a)]
- 4.2.4 Within 180 days after startup of RCO1, the Permittee shall conduct capture efficiency testing on each paint booth (PB01, PB02, and PB03). Method 204 may be used to verify permanent total enclosure status of each booth.

Enclosures that meet the requirements of EPA Method 204 of Appendix M of 40 CFR Part 51 for a PTE are assumed to have a capture efficiency of 100%. Note that the criteria that all access doors and windows that are not treated as natural draft openings shall be closed during routine operation of the process is not intended to require that these doors and windows be closed at all times. It means that doors and windows must be closed any time that parts, personnel, or equipment are not being moved through them while parts are being coated.

[391-3-1-.02(3)(a)]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)****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.  
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]
- a. The combustion zone temperature of the recuperative thermal oxidizer at a position prior to any substantial heat loss/exchange. Such devices shall have a required accuracy of  $\pm 1.2^{\circ}\text{C}$  or  $\pm 1$  percent of the temperature value in degrees Celsius, whichever is larger.
  - b. The gas temperature at the inlet to the desorption section of each of the concentrators. Such devices shall have a required accuracy of  $\pm 1.2^{\circ}\text{C}$  or  $\pm 1$  percent of the temperature value in degrees Celsius, whichever is larger.
- 5.2.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]
- a. The differential pressure between the inside and outside of each paint booth. Data shall be recorded once per operating day.
  - b. The pressure drop of the vent stream across the adsorber section of each concentrator. Data shall be recorded once per operating day.
- 5.2.3 The Permittee shall conduct an inspection of the concentrator bed material of each rotary concentrator at least once every 12 months to check for fouling, channeling, and other signs of wear to demonstrate that the material is functioning properly. The findings of the inspection shall be recorded in a log suitable for inspection and/or submittal to the Division.  
[391-3-1-.02(6)(b)1]
- 5.2.4 If the bypass dampers serving Paint Booths PB01, PB02, and PB03 are ever opened during paint booth operation, the Permittee shall monitor and record parameters sufficient to determine the percentage of each paint booth exhaust routed to bypass and percentage routed to RCO1. During such periods, the uncontrolled VOC emissions shall be calculated on a daily basis.  
[391-3-1-.02(6)(b)1]

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements**

- 6.1.8 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following exceedances, and excursions shall be reported: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. 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 average recuperative thermal oxidizer temperature (as monitored in accordance with Condition 5.2.1a) falls 50°F or more below the temperature established during the most recent performance test. Until initial testing is performed, the excursion temperature shall be 1500°F.
    - ii. Any three-hour period during which the average desorption inlet temperature of either rotary concentrator (as monitored in accordance with Condition 5.2.1b) falls 50°F or more below the temperature established during the most recent performance test. Until initial testing is performed, the excursion temperature shall be 310°F.
    - iii. Any two consecutive readings of pressure differential (as monitored in accordance with Condition 5.2.2a) of less than 0.007 inches water column.
    - iv. Any two consecutive readings of pressure drop across the adsorption section (as monitored in accordance with Condition 5.2.2b) of less than 2.4 inches water column.
  - b. In addition to the excursions specified above, the following should also be included with the report required in Condition 6.1.4:
    - i. The total operating period that any paint booth exhaust is vented to the bypass stacks, the VOC usage for each booth during that period, and the estimated bypass percentage.

**6.2 Specific Record Keeping and Reporting Requirements**

- 6.2.9 The Permittee shall use the overall control efficiency of RCO1 determined during the most recent performance testing and the capture efficiency determined during the most recent performance testing as the control efficiency for Conditions 6.2.2 and 6.2.6 except under the following conditions:  
[391-3-1-.02(6)(b)1]
- a. Any period defined as an excursion under Condition 6.1.8.a.i. During such periods, the Permittee shall use an overall control efficiency of zero (0) percent.
  - b. Any period defined as an excursion under Condition 6.1.8.a.ii. During such periods, the Permittee shall use an overall control efficiency of zero (0) percent.
  - c. Any operating period during which paint booth exhaust is vented to the bypass stacks. During such periods, the Permittee shall adjust the capture efficiency to reflect the percentage of exhaust vented to bypass instead of to RCO1.
- 6.2.10 The Permittee shall maintain separate records of VOC-containing material and HAP-containing material as required in Conditions 6.2.1 and 6.2.2 for each paint booth.  
[391-3-1-.02(6)(b)1]
- 6.2.11 The Permittee shall notify the Division in writing within 15 days after startup of RCO1.  
[391-3-1-.02(6)(b)1]
- 6.2.12 The Permittee shall notify the Division in writing within 15 days after each instance that the concentrator bed material is replaced.  
[391-3-1-.02(6)(b)1]