

**SIP CONSTRUCTION & OPERATING PERMIT AND TITLE V 502(b)10 CHANGE APPLICATION REVIEW**

Facility Name: **Honda Lock – America (HLA)**

City: Bremen

County: Haralson

AIRS #: 04-13-143-00027

Application #: 17260

Date SIP Application Received: February 14, 2007

Date Title V Application Received: N/A

Permit No: 3429-143-0027-V-02-2

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP</b>	Katie Gregory	Eric Cornwell
<b>SSCP</b>	Megan Kinsey	Stacey Wix
<b>ISMP</b>	Sid Stephens	Richard Taylor
<b>TOXICS</b>	N/A	N/A

**Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and operate and Section 502(b)(10) change to the Part 70 source. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1), 391-3-1-.03(2), and 391-3-1-.03(10). of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the permit and is presented in the same general order as the permit amendment. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

**I. Facility Description**

**A. Existing Permits**

Table 1 below lists the current Title V permit, all administrative amendments and minor and significant modifications to that permit, and any 502(b)(10) changes. Comments are listed in Table 2 below.

**Table 1: Current Title V Permit and Amendments**

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3429-143-0027-V-02-0	4/30/05	x	
3429-143-0027-V-02-1	1/17/06	x	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
3429-143-0027-V-02-0	Initial Title V permit after SM source expanded from 100 tpy limit to 249 tpy limit on VOC
3429-143-0027-V-02-1	502(b)(10) for the construction and operation of a VOC control system consisting of two rotary concentrators and a recuperative thermal oxidizer.

**B. Regulatory Status**

**1. PSD/NSR/RACT**

This facility is minor under PSD. Potential emissions are limited to less than the PSD major source threshold. Nonattainment provisions of NAA NSR or RACT do not apply in Haralson County.

2. Title V Major Source Status by Pollutant

**Table 3: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	x			x
PM <sub>10</sub>	x			x
SO <sub>2</sub>				
VOC	x	x		
NO <sub>x</sub>	x			x
CO	x			x
TRS				
H <sub>2</sub> S				
Individual	x			x
Total HAPs	x			x

**II. Proposed Modification**

A. Description of Modification

HLA submitted a letter requesting revisions to Permit Amendment 3429-143-0027-V-02-1 to address the fact that the coating operation permitted under that amendment will not be operating as a permanent total enclosure (PTE) but will be a partial enclosure.

The revisions include alternative monitoring parameters that were suggested by the manufacturer of the VOC control system to more adequately demonstrate continued VOC capture and destruction performance.

This permit modification, involving changes to existing conditions, can be performed as a 502(b)(10) permit change because the conditions that are to be modified were instituted in a 502(b)(10) permit, not a Title V Permit Amendment.

B. Emissions Change

There is no change in emissions associated with this modification. This modification corrects language for monitoring and testing.

C. Title I Modification

- PSD/NSR Applicability

This is a minor source under PSD regulations, therefore PSD does not apply.

- NSPS Modification

No NSPS apply.

- NESHAP Modification

The facility is a minor source of HAPs therefore no NESHAPs apply.

**III. Facility Wide Requirements**

A. Emission and Operating Caps

No changes.

B. Applicable Rules and Regulations

No changes.

C. Compliance Status

No noncompliance issues are known.

D. Operational Flexibility

None requested.

E. Permit Conditions

No changes.

**IV. Regulated Equipment Requirements**

A. Brief Process Description

The facility extrudes and paints plastic automotive parts. Parts are painted in three paint booths (Primer - PB01; Base Coat - PB02, and Top Coat - PB03). Each booth has an associated curing oven. The VOC emissions are currently emitted uncontrolled, but HLA is proposing to install a rotary concentrator/recuperative thermal oxidizer to control VOC emissions from each of these booths. For more detail, see Section II.A of this narrative.

B. Updated Equipment List

There will be no changes to the equipment.

C. Equipment & Rule Applicability

There will be no changes to the applicable rules.

D. Compliance Status

No noncompliance issues are known.

E. Operational Flexibility

None requested.

F. Permit Conditions

No changes were made to conditions in this section of the permit amendment.

**V. Testing Requirements (with Associated Record Keeping and Reporting)**

Condition 4.1.3 was modified to change the reference to Method 204 for permanent total enclosure to Methods 204A- F with Appendix G for determining capture efficiency for partial enclosures.

Condition 4.2.4 was modified to reflect that HL-A will be meeting the partial enclosure requirements not the permanent total enclosure requirements.

There are three stacks that are not connected to control device RC01 that may potentially exhaust emissions. Capture efficiency testing will be used to determine the percentage of VOC emissions that are routed to control device RC01 versus the percentage of VOC emissions which are released through these three stacks.

**VI. Monitoring Requirements (with Associated Record Keeping and Reporting)**

The chosen concentrator parameters to be monitored are desorption air inlet temperature, before the air duct is split and routed to the two concentrators, and the static duct pressure on the combined exhaust from the enclosures to the oxidizer. If desorption temperature falls too low, the bed will not be cleaned out properly and may be unable to adsorb VOC adequately. Since there is a partial enclosure, the static duct pressure measurement allows the facility to maintain the same flow conditions as those during the performance test. Periodic inspection of the bed material is also recommended.

For the partial enclosure, the static duct pressure should not be less than the average duct pressures established during the most recent performance test, and until testing occurs, the duct pressure should be 0.05 inches water column.

Condition 5.2.1 requires continuous monitoring of combustion zone temperature for the oxidizer, the inlet desorption gas temperature, before the air duct is split and routed to the concentrators, and the static duct pressure on the combined exhaust from the enclosures to the oxidizer.

Condition 5.2.2 requires daily recording of the seal pressure of each concentrator.

**VII. Other Record Keeping and Reporting Requirements**

Condition 6.1.8 was modified to include excursions applicable to the change from the requirements of a PTE to the requirements of a partial enclosure. Pressure drop is not measured, but static duct pressure and seal pressure. The excursions were modified to reflect this change.