west virginia department of environmental protection

Division of Air Quality
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Charleston, WV 25304
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

June 22, 2016

CERTIFIED MAIL
91 7199 9991 7035 6665 8066

Steve Stalnaker
1 Hino Way
Williamstown, WV 26187

RE: Hino Motors Manufacturing U.S.A., Inc.
Williamstown Facility
Permit Application R13-3251A
Plant ID No. 107-00153

Dear Mr. Stalnaker:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-3251A is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

The source is not subject to 45CSR30.

In accordance with 45CSR22 - Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the Certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1212.

Sincerely,

Thornton E. Martin Jr.

Thornton E. Martin Jr.
Permit Engineer

c: Patrick Ward, Potesta & Associates, Inc.

West Virginia Department of Environmental Protection

Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit to Modify through a Class II Administrative Update

R13-3251A

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Hino Motors Manufacturing U.S.A., Inc.
Williamstown
107-00153

William F. Durham
Director

Issued: June 22, 2016

This permit will supercede and replace Permit R13-3251.

Facility Location:	Williamstown, Wood County, West Virginia
Mailing Address:	1 Hino Way Williamstown, WV 26187
Facility Description:	Truck Assembly and Painting Facility
NAICS Code:	371101
UTM Coordinates:	459.52 km Easting •4,360.60 km Northing • Zone 17
Permit Type:	Class II Administrative Update
Description of Change:	Addition of a retractable paint booth for repair operations and windshield installation operation.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is not subject to 45CSR30.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1E	Paint Booth No. 1 with Heater (with Paint Mix Room)	2015	Paint Gun 225 gr/min Heater 1.5126 MMBtu/hr	Filter
2S	2E	Paint Booth No. 2 with Heater (with Paint Mix Room)	2015	Paint Gun 225 gr/min Heater 1.5126 MMBtu/hr	Filter
3S	3E	Paint Booth No. 3 with Heater (with Paint Mix Room)	Future	Paint Gun 225 gr/min Heater 1.5126 MMBtu/hr	Filter
4S	4E	Body Prep Room	2015	5,000 lb/hr	Filter
5S	5E	Inspection, Touchup, Cleaning, and Miscellaneous	2007	7 Trucks/hr (average) 20,000 Trucks/year	NA
6S	6E	Welding	2007	NA	NA
7S	7E	Engine Emissions	2007	NA	NA
8S	8E	Parts Washer	2007	NA	NA
9S	9E	Emergency Generator	2014	40 HP	NA
10S	10E	Building Heaters	2007/2015	Btu/hr	NA
11S	11E	Retractable Paint Booth	2016	Paint Gun 225 gr/min	Filter
12S	12E	Windshield Installation	2016	NA	NA
VA	VA	Vehicle Activity	2007	NA	NA
DeMinimis		Diesel Tank	2007	5,000 gal	NA
DeMinimis		Vehicle Fluid Storage Totes, Drums and Containers	2007	Various	NA

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NOx**	Nitrogen Oxides
CBI	Confidential Business Information	**NSPS**	New Source Performance Standards
CEM	Continuous Emission Monitor	**PM**	Particulate Matter
CES	Certified Emission Statement	**$PM_{2.5}$**	Particulate Matter less than 2.5 µm in diameter
C.F.R. *or* CFR	Code of Federal Regulations	**PM_{10}**	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	**Ppb**	Pounds per Batch
C.S.R. *or* CSR	Codes of State Rules	**Pph**	Pounds per Hour
DAQ	Division of Air Quality	**Ppm**	Parts per Million
DEP	Department of Environmental Protection	**Ppmv or ppmv**	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	**PSD**	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	**Psi**	Pounds per Square Inch
HAP	Hazardous Air Pollutant	**SIC**	Standard Industrial Classification
HON	Hazardous Organic NESHAP	**SIP**	State Implementation Plan
HP	Horsepower	**SO_2**	Sulfur Dioxide
lbs/hr	Pounds per Hour	**TAP**	Toxic Air Pollutant
LDAR	Leak Detection and Repair	**TPY**	Tons per Year
M	Thousand	**TRS**	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	**TSP**	Total Suspended Particulate
MDHI	Maximum Design Heat Input	**USEPA**	United States Environmental Protection Agency
MM	Million	**UTM**	Universal Transverse Mercator
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour	**VEE**	Visual Emissions Evaluation
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour	**VOC**	Volatile Organic Compounds
NA	Not Applicable	**VOL**	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation*;

2.4. Term and Renewal

2.4.1. This permit supercedes and replaces previously issued Permit R13-3251. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3251A, R13-3251, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; **[45CSR§§13-5.11 and -10.3.]**

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable

to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1.]**

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] ***[State Enforceable Only]***

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in

this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:
Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or

contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for a Certificate to Operate (CTO), from the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office no later than 30 days prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the Application for a Certificate to Operate (CTO).

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Controlled VOCs emissions generated from the application of surface coatings and paint booth heaters vented through emission points 1E, 2E, 3E and the retractable paint booth 11E combined at the facility shall not exceed 51.56 lb/hr and 28.37 TPY. For purposes of limiting the facility's emissions to the above mentioned limits, the following conditions are established:

a. The maximum annual usage of coatings as applied shall not exceed 15,000 gallons per year, minus water and other exempt compounds;

b. The daily weighted average of coatings applied during an operating day at the facility shall not exceed 3.5 pounds of VOC per gallon for primer and paint and 4.3 pounds of VOC per gallon for clear coat. VOC content is expressed in units of mass of VOC (lb) per volume of coating (gal), minus water and exempt compounds, as applied.
[45CSR§21-19.3.a.3.]

c. Any record showing use of any non-complying coatings (VOC content > 3.5 lb/gal primer and paint and > 4.3 lb/gal for clear coat, as applied) shall be reported by sending a copy of such record to the Director within 30 days following that use.
[45CSR §21-4.3.c.1.]

d. The use of open containers for the storage or disposal of cloth impregnated with VOCs that are used for surface preparation cleanup, or coating/adhesive removal is prohibited.
[45 CSR §21-8.2.]

e. Spent or fresh VOC to be used for surface preparation, cleanup or coating/adhesive removal shall not be stored in open containers.
[45 CSR §21-8.3.]

f. VOCs for cleanup of spray equipment must be performed in a manner such that cleaning compounds are collected and the evaporation of VOCs to the atmosphere is minimized.
[45 CSR §21-8.4.]

4.1.2. Controlled PM, PM_{10}, and $PM_{2.5}$ emissions from the application of surface coatings from the three paint booths (1S), (2S), (3S) and retractable paint booth(11S) at the facility shall not to exceed 0.11 lb/hr and 0.20 TPY for each booth and visible emissions from emission points 1E, 2E, 3E and 11E shall not be greater than 20% opacity. For purposes of limiting the facility' emissions to the above mentioned limits, the following conditions are established:

a. Paint booths venting to emission points 1E, 2E, 3E and 11E shall be equipped and maintained with paint arresters (fabric filters) with a particulate matter removable efficiency of no less than 99%. The filter system shall be in place, properly maintained and functioning before the Paint Booths are placed into operation.

b. The coating application equipment used in the paint booths shall be high volume low pressure (HVLP) type system or equivalent systems that have a transfer efficiency of no less than 65%.

c. The solids content of any surface coating at the facility shall not exceed a solid content of 7.59 pounds per gallon of coating as applied.

4.1.3. All PM, PM_{10}, and $PM_{2.5}$, emissions from the sanding of the truck bodies in the Body Prep Room (4E) to prepare the vehicles for painting at the facility shall not exceed the following:

Pollutant	lb/hr	TPY
PM	5.00	21.90
PM_{10}	2.38	10.43
$PM_{2.5}$	2.38	10.43

For purposes of limiting the facility' emissions to the above mentioned limits, the following condition is established:

a. The maximum weight of material processed through the operation in a single hour shall not exceed 5,000 pounds.

4.1.4. The facility-wide emission rate of Hazardous Air Pollutants (HAPS) shall not exceed, on a per HAP basis, ten (10) tons per year, or on a total aggregated HAP basis, 25 tons per year. The use of any new surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP that is not listed in permit application R13-3251A shall be in accordance with the following:

a. The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.

b. The use of the new surface coating shall be incorporated into the record keeping requirements to show compliance with the VOC/HAP limits contained in this permit.

c. Emissions from the use of the new surface coating when combined with emissions from surface coatings already in use shall not exceed:

- the facility-wide, single HAP emission limit of 10 ton/yr, and
- the facility-wide, total aggregated HAP emission limit of 25 ton/yr.

d. For the purposes of this permit, surface coatings shall be defined as a material applied onto, or impregnated into, a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, stains, thinners, solvents, sealers, varnishes, paints, primers, catalysts, acrylics, lacquers, and temporary protective coatings, or combinations of the above materials as applied.

4.1.5. Emissions associated with the Miscellaneous touch-up Paint, Cleaning, Material Use area (5S) and Windshield Installation (12S) shall not exceed 5.65 lb/hr and 8.12 TPY of VOC. For purposes of limiting the facility's emissions to the above mentioned limits, the following conditions are established.

a. All miscellaneous touch-up, cleaning, material and adhesive use activities will be performed on no more than seven (7) trucks per hour (average) and 20,000 trucks per year.

b. The use of open containers for the storage or disposal of cloth impregnated with VOCs that are used for surface preparation cleanup, or coating/adhesive removal is prohibited. **[45 CSR §21-8.2.]**

c. Spent or fresh VOC to be used for surface preparation, cleanup or coating/adhesive removal shall not be stored in open containers.
[45 CSR §21-8.3.]
d. VOCs for cleanup of spray equipment must be performed in a manor such that cleaning compounds are collected and the evaporation of VOCs to the atmosphere is minimized.
[45 CSR §21-8.4.]

4.1.6. The maximum hours of operation of EPA Certified 22 kW Generac Emergency Generator (9S) shall not exceed 500 hours per year. The 40 hp engine's emissions shall not exceed 0.19 lb/hr and 0.05 TPY of NOx and 8.93 lb/hr and 2.23 TPY of CO. Compliance with this limit shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months.

4.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

4.2.1. The permittee shall monitor and record the following information for the purposed of complying the limitations in Condition 4.1. on a daily basis:
a. The name and identification number of each coating, as applied;
b. The mass of the VOC per volume (minus water and exempt compounds) and the volume of each coating (minus water and exempt compounds), as applied, used each day;
c. The daily-weighted average VOC content of all coatings, as applied, on each coating operation calculated according using the following equation:

$$VOC_w = \frac{\sum_{i=1}^{n} V_i C_i}{V_T}$$

Where:

VOC_w = The daily-weighted average VOC content of the coatings, as applied, used a coating operating in of pounds per gallon of coating (lb VOC/gal), minus water and exempt compounds;
n = The number of different coatings, as applied, each day.
V_i = The volume of each coating, as applied, each day, minus water and exempt compounds
C_i = The VOC content of each coating, as applied each day, in units of lb VOC/gal, minus water and exempt compounds.
V_T = The total volume of all coating, as applied, each day, in units of gallons, minus water and exempt compounds.**[45CSR §§21-4.4.b & 43.1]**

4.2.2. Alternative monitoring for the use of Compliance Coating. If the permittee has elected to only apply compliance coatings and satisfied the notice requirements of Condition 4.5.1., then the permittee shall monitor and record the following information each day of operation:
a. The name and identification number of each coating, as applied;
b. The mass of VOC per volume of each coating (minus water and exempt compounds), as applied, used each day;
c. Volume of coating applied during the day, minus water and exempt compounds.
[45 CSR §21-4.3.b.]

4.2.3. For the purpose of determining compliance with the opacity limits given in Sections 4.1.1., 4.1.2. & 4.1.3. (per 45CSR7-3.1), the permittee shall conduct visible emission checks and/or opacity monitoring and record keeping for the three Paint Booths (1S, 2S, & 3S) and Retractable Paint Booth (11S).

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted for the three Paint Booths (1S, 2S, & 3S) and Retractable Paint Booth (11S) at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at the three Paint Booths (1S, 2S, & 3S) and Retractable Paint Booth (11S) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at the source (having visible emissions) using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

4.3. Testing Requirements

[Reserved]

4.4. Recordkeeping Requirements

4.4.1. **Paint Booths (1S, 2S & 3S) and Retractable Paint Booth (11S) VOC Emission Rate.** For the purpose of determining compliance with the VOC emission limitations set forth in Section 4.1.1. of this permit, the permitted facility shall record on a daily basis:

- the name, identification number, and number of gallons of compliant coating applied,

- the mass of VOC per volume of each coating (minus water and exempt compounds), as applied, each day.

- the 12-month rolling total for number of gallons of compliant coating applied and VOC emission total for the three Paint Booths (1S, 2S & 3S) and Retractable Paint Booth (11S).

An example daily record form for complying coatings is provided in Attachment B to this permit. These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

4.4.2. **Paint Booths (1S, 2S & 3S), Retractable Paint Booth (11S) and Body Prep Room (4S) Monthly Opacity Reading Records.** For the purpose of demonstrating compliance with the opacity limit given in Sections 4.1.2. & 4.1.3. (per 45CSR7-3.1), the permittee shall maintain

records (see example form given in attached Appendix A) of all monitoring data documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

4.4.3. **Miscellaneous touch-up Paint, Cleaning, Material Use area (5S) and Windshield Installation (12S).** For the purpose of determining compliance with the VOC emission limitation set forth in Section 4.1.5. of this permit, the facility shall record on a daily basis the amount of vehicles (trucks) assembled and the 12-month rolling total of vehicles (trucks) assembled for the facility. These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

4.4.4. **Facility HAP Emission Rates.** For the purpose of determining compliance with the single HAP emission rate limitations set forth in Section 4.1.4. of this permit, record shall be kept on a daily basis detailing the single HAP emission rate(s) from the facility using information collected from the Paint Booths (1S, 2S & 3S), Retractable Paint Booth (11S) operations and from cleaning solvent(s) usage for the facility. In addition to the daily single HAP emission rate(s), 12-month rolling single HAP emissions rate(s) shall also be recorded daily.

4.4.5. **Paint Booth Pad/Filter Changeout.** For the purpose of determining compliance with the PM emission limitations set forth in Section 4.1.2. of this permit, the permitted facility shall record when the Arrector Pads/Exhaust Filters are changed out. If not all of the Pads/Filters are changed out at the same time, then the location of the changed out and non-changed out Pads/Filters shall be noted for the record. These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

4.5. Reporting Requirements

4.5.1. Per Section 4.1.4.a. of this permit:

The permittee shall notify the Director in writing of the use of any new surface coating containing any HAP(s) within thirty (30) days of using the new surface coating. An MSDS sheet for the surface coating shall be included with the notice to the Director.

4.5.2. Any record showing non-compliance or exceedence with the limit in item a, b, or c of Condition 4.1.1. f this permit shall be reported by sending a copy of the record to the Director within 30 days following the occurrence.

APPENDIX A

Example Form
Monthly Opacity Record

Date of Observation: _____
Data Entered by: _____
Reviewed by: _____
Date Reviewed: _____
Describe the General Weather Conditions:

Stack ID/Vent ID/ Emission Point ID	Stack/Vent/Emission Point Description	Time of Observation	Visible Emissions? Yes/No	Consecutive Months of Visual Emissions	Comments

APPENDIX B
RECORDKEEPING FORM
FOR FACILITIES SUBJECT TO EMISSION LIMITATIONS OF 45CSR21
(COMPLYING COATINGS)

Name of the Facility
Date __/__/
This record must be maintained at the facility until _/__/

Name of Coating	**Manufacturer and ID Number of Coating**	**No. of Gallons**	**Mass of VOC Per Volume of Coating as Applied (lb/gal)***
Total			
12-month Rolling Total			

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] (please use blue ink) _____ Responsible Official or Authorized Representative _____ Date

Name & Title (please print or type) _____ Name _____ Title

Telephone No. _____ Fax No. _____

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[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.