Facility Name: **Yamaha Motor Manufacturing Corporation of America**
City: Newnan
County: Coweta
AIRS #: 04-13-077-00039

Application #: TV-61796
Date Application Received: November 20, 2017
Permit No: 3799-077-0039-V-06-0

Program	Review Engineers	Review Managers
SSPP	Dawn Wu	Manny Patel
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Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Yamaha Motor Manufacturing Corporation of America

2. Parent/Holding Company Name

   Yamaha Motor Manufacturing Corporation of America

3. Previous and/or Other Name(s)

   None known.

4. Facility Location

   1000 Highway 34 East
   Newnan, Georgia 30265 (Coweta County)

5. Attainment, Non-attainment Area Location, or Contributing Area

   The facility is located in the Atlanta Nonattainment area.

B. Site Determination

YMMC owns a facility, Georgia Advanced Metals (GAM), less than five miles from the main plant. GAM supplies YMMC with wheels, water vehicle shipping containers, and other miscellaneous aluminum and steel parts. The main manufacturing operations include metal fabrications (e.g. welding). Welding activities that include metal HAPs are proposed to be included as insignificant activities since HAP emissions from these activities are less than 1,000 pounds per year. These are considered same Title I site.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3799-077-0039-V-05-0	5/30/2013	Title V Renewal
Off-Permit change	7/29/2014	Relocation of the D-Line Rework Paint Booth
Off-Permit change	10/7/2014	Installation of three touch up booths

D. Process Description

1. SIC Codes(s)

3799

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

This facility produces golf carts, water vehicles and all-terrain vehicles.

3. Overall Facility Process Description

Yamaha Motor Manufacturing Corporation of America operates a manufacturing facility in Newnan, Georgia. The facility produces golf carts (GC), recreational water vehicles (WV), and all-terrain vehicles (ATV). The current manufacturing operations include material handling and storage, metal fabrications (welding), fiberglass molding, plastics injection molding, urethane foaming, plastic component buffing and drilling, electrostatic deposition base coating, powder top coating for metal parts, surface preparation and spray coating for metal and plastic parts, and final vehicle assembly and testing.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is a major source under NSR regulations because it has the potential to emit more than 25 tons of VOC annually in the Atlanta ozone non-attainment area. Any future facility modification causing any increases in NO_x and/or VOC emissions will require a NSR applicability analyses to determine if the modification is major and thus subject to non-attainment area (NAA) permitting requirements under NSR regulations and to the pertinent State rules. This facility is a minor source for other regulated air pollutants.

Permit No. 3799-077-0039-V-03-0 contained two annual VOC emission limits (10 tpy and 99.3 tpy) to avoid being subject to NAA/NSR review. These limits were established during 2001 for the construction of the E-Line, F-Line, DO02, TMD1 and for modifying the existing C-Line and D-Line. In order for the 2001 modification to avoid both NSR review and the requirements under Rule 391-3-1-.03(8)(c)13 - Additional Provisions for Ozone Nonattainment Areas, the VOC emission increases due to the 2001 modification were limited to 24.9 tons per year (tpy), below the "significant level" under both rules. This emission cap was then allocated between the new process lines E-Line and F-Line and the existing facility in such a way that the increased VOC emission limit for the existing facility in Condition 3.2.2 remained below 100 tpy to avoid a retroactive NSR review. Because the 24.9 tpy increase in VOC emissions was from the facility-wide "NSR baseline VOC emissions", i.e., from the facility-wide actual annual VOC emissions averaged over 24-month period prior to the 2001 modification, the 2001 modification was a facility-wide modification with regard to the VOC emissions. Because both the addition of new emission units to an existing facility/emission unit group and the establishment of new/additional emission unit groups were allowed during a facility-wide modification under the pertinent NSR and State rules, the proposed modification, i.e., moving emission units DO02 and DTM1 from Condition 3.2.1 to Condition 3.2.2 is acceptable. This change of DO02 and DTM1 from Condition 3.2.1 to Condition 3.2.2 occurred in Permit Amendment No. 3799-077-0039-V-03-1.

Permit Amendment No. 3799-077-0039-V-03-2 revised the emission limit in Condition 3.2.2 to avoid NSR for the construction of a new paint spray booth, a flash-off tunnel in the existing D Paint Line (D-Line), a new tack/mask booth, two new rework paint spray booths and a new RTO. Since the accumulated VOC emission changes for the five-year contemporaneous period was less than 25 tpy, NSR review was not required for this modification. The modified limit (77.9 tpy) was the sum of the NSR baseline VOC emissions from the group based on the annual average of the previous 24-month VOC emissions and the estimated VOC emission increases due to the modification.

Permit Amendment No. 3799-077-0039-V-04-1 also revised the emission limit in Condition 3.2.2 to avoid NSR for the construction of the new G-Line by limiting the net emission increases over the five-year contemporaneous period to less than 25 tpy. The five-year contemporaneous period was from 2005 through 2009 due to a proposed construction date of January 2009. Because the D-Line was constructed during this period, the combined emission increases from the D-Line and the proposed G-Line were limited to less than 25 tpy to avoid NSR. The baseline of 68 tpy and the NSR avoidance limit of 24.9 revised the emission limit in Condition 3.2.2 to 92.9 tpy.

Previously, the facility avoided NSR/PSD by limiting the fuel sulfur content limit to 0.5% by weight; however the Yamaha has currently chosen to only combust natural gas and propane in combustion sources.

Combined with this renewal, the facility decided to remove some of Permitted Emission Units (PB03, PB04, PB05, PB07, PB08, and PB10). The NSR regulations review is not needed.

2. Title V Major Source Status by Pollutant

Table 2: 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	✓			✓
PM_{10}	✓			✓
$PM_{2.5}$	✓			✓
SO_2	✓			✓
VOC	✓	✓		
NO_x	✓		✓	
CO	✓			✓
TRS	N/A			
H_2S	N/A			
Individual HAP	✓		✓	
Total HAPs	✓		✓	

3. MACT Standards

The facility has a synthetic minor status for HAP emissions.

The facility will avoid the requirements of 40 CFR 63 Subpart JJJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boiler" by limiting the fuel combusted in the boilers to natural gas or propane.

The facility is not subject to 40 CFR 63, Subpart HHHHHH - "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" because they do not use products with the targeted HAPs.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

HAP emissions are limited to less than 10/25 tons for any 12 consecutive months for MACT avoidance.

Facility-wide NOx emissions are limited to 25 tpy. This limit allows the facility to remain a synthetic minor status for NOx emissions and to avoid the requirements for Georgia Rule 391-3-1-.02(2)(rrr) – NOx Emissions from Small Fuel-Burning Equipment.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no facility-wide compliance issues noted with this application.

D. Permit Conditions

Condition No. 2.1.1 is a facility-wide annual HAP emissions limit which ensures that the facility is not a major source under NESHAP/CAA 112(j) or 112(g).

Condition No. 2.1.2 is a facility-wide NOx emission limit of 25 tons per year which allows the facility to remain a synthetic minor source for NOx emissions and to avoid the NOx emission requirements under Georgia Rule 391-3-1-.02(2)(rrr).

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III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
AGW1	Golf Cart/ATV and Water Vehicle Assembly Lines	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 2.1.2, 3.2.2, 3.4.3, 3.4.7, 3.4.8, 3.5.1, 5.2.5, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10	N/A	None
AM07	Water Vehicle Assembly Bonding Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.3,6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
BL01	8.4 mm BTU/Hr. Steam Boiler No. 1 Burn natural gas and/or propane only	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.9, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	N/A	None
BL02	8.4 mm BTU/Hr. Steam Boiler No. 2 Burn natural gas and/or propane only	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.9, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	N/A	None
BL03	8.4 mm BTU/Hr. Steam Boiler No. 3 Burn natural gas and/or propane only	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.9, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	N/A	None
BL04	8.2 mm BTU/Hr. Steam Boiler No. 4	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.1, 3.2.3, 3.4.9, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	N/A	None
DB01	D-Line Paint Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 5.2.2, 5.2.3, 5.2.5, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	WC05	Water Curtain
DB02	D-Line Paint Booth No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.4, 3.2.5, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12	RTO1, WC17	Regenerative Thermal Oxidizer, Water Curtain
DRB1	D-Line Rework Paint Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.4.1, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 3.5.3, 5.2.5, 6.2.1, 6.2.2, , 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	N/A	Dry filters
DF01	D-Line Flash Tunnel	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.4.1, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 5.2.2, 5.2.5, 6.2.1, 6.2.2, , 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	N/A	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
DF02	D-Line Flash-Off Tunnel No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.4, 3.2.5, 3.4.1, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 5.2.7, 6.2.1, 6.2.2, 6.2.3, , 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12	RTO1	Regenerative Thermal Oxidizer
DTM1	D-Line Tack/Mask Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.2, 3.4.7, 3.4.8, 3.5.1, 5.2.5, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
DTM2	D-Line Tack/Mask Booth No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.2, 3.4.7, 3.4.8, 3.5.1, 5.2.5, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
EB01	E-Line E-Coat Bath	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.5, 3.4.6, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.7, 6.2.8, 6.2.9, 6.2.10	N/A	None
DO02	D-Line Cure Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
EO01	E-Line E-Coat Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.1, 3.2.3, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
FO01	F-Line Powder Coat Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
PA02	A-Line E-Coat Bath	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.2, 3.4.5, 3.4.6, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.7, 6.2.8, 6.2.9, 6.2.10	N/A	None
PA03	A-Line E-Coat Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	N/A	None
PA07	B-Line Powder Coat Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	N/A	None
GTM1	G-Line Tack / Mask Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.2, 3.4.3, 3.4.7, 3.4.8, 3.5.1, 5.2.5, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.7, 6.2.8, 6.2.9, 6.2.10	N/A	None
GB01	G-Line Paint Spray Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.5, 3.2.6, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	RTO2 / WC 18	Regenerative Thermal Oxidizer / Water Curtain

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
GB02	G-Line Paint Spray Booth No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.5, 3.2.6, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	RTO2 / WC 19	Regenerative Thermal Oxidizer / Water Curtain
GB03	G-Line Paint Spray Booth No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.5, 3.2.6, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	RTO2 / WC 20	Regenerative Thermal Oxidizer / Water Curtain
GF01	G-Line Flash-Off Tunnel No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.5, 3.2.6, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	RTO2	Regenerative Thermal Oxidizer
GF02	G-Line Flash-Off Tunnel No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.5, 3.2.6, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	RTO2	Regenerative Thermal Oxidizer
GF03	G-Line Flash-Off Tunnel No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.2.5, 3.2.6, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	RTO2	Regenerative Thermal Oxidizer
GO01	G-Line Cure Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 2.1.2, 3.2.2, 3.2.3, 3.2.5, 3.2.6, 3.4.7, 3.4.8, 4.2.1, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	RTO2	Regenerative Thermal Oxidizer
PS01	Paint Shop Miscellaneous VOC Usages	391-3-1-.02(2)(tt)	2.1.1, 3.2.2, 3.4.3, 3.5.1, 5.2.5, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.7, 6.2.8, 6.2.9, 6.2.10	N/A	None
SM01	SMC Sheet Molding Compound Press	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.2, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
SM02	SMC Sheet Molding Compound Press	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.2, 3.4.7, 3.4.8, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
SC01	Cold Solvent Metal Parts Cleaner/Washer No. 1	391-3-1-.02(2)(ff)	2.1.1, 3.2.2, 3.4.10, 3.5.1, 5.2.4, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
SC02	Cold Solvent Metal Parts Cleaner/Washer No. 2	391-3-1-.02(2)(ff)	2.1.1, 3.2.2, 3.4.10, 3.5.1, 5.2.4, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	(None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
SC03	Cold Solvent Metal Parts Cleaner/Washer No. 3	391-3-1-.02(2)(ff)	2.1.1, 3.2.2, 3.4.10, 3.5.1, 5.2.4, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
SC04	Cold Solvent Metal Parts Cleaner/Washer No. 4	391-3-1-.02(2)(ff)	2.1.1, 3.2.2, 3.4.10, 3.5.1, 5.2.4, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
SP01	Plant 2 Surface Preparation	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.2.1, 3.4.7, 3.4.8, 3.5.1, 5.2.5, 6.2.1, 6.2.2, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10	N/A	None
WVR1	Water Vehicle Assembly Rework Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.4.1, 3.4.7, 3.4.8, 3.5.3, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.13	N/A	Dry filters
TVR1	Terrain Vehicle Assembly Rework Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.4.1, 3.4.7, 3.4.8, 3.5.3, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.13	N/A	Dry filters
ABR1	A/B Line Paint Rework Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.4.1, 3.4.7, 3.4.8, 3.5.3, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.13	N/A	Dry filters

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

There are two caps. One limits the VOC emissions to be less than 10 tpy for the process/emissions units BL04, EB01, EO01, FO01 and SP01. The other one limits the VOC emissions to be less than 92.9 tpy for the operations/emissions units AGW1, AM07, BL01, BL02, BL03, DB01, DB02, DF01, DF02, DO02, DRB1, DTM1, DTM2, PA02, PA03, PA07, PS01, SC01, SC02, SC03, SC04, SM01, SM02, GTM1, GB01, GB02, GB03, GF01, GF02, GF03 and GO01.

Rules and Regulations Assessment:

The facility will be subject to the following rules:

- Georgia Rule 391-3-1-.02(2)(b) – "Visible Emissions"
- Georgia Rule 391-3-1-.02(2)(d) - "Fuel-burning Equipment"
- Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emission from Manufacturing Processes"
- Georgia Rule 391-3-1-.02(2)(tt) – "VOC Emissions from Major Source" applies to the VOC emissions from the plastic parts spray booth. The existing RACT requirements in Condition No. 3.4.1 of permit No. 3799-077-0039-V-03-0 will apply when the coating operations are performed manually. Condition No. 3.4.2 applies when robotic applicators are used for the coating operations. All the rework paint booths are not subject to Condition No. 3.4.2 because they are manual operation. The RACT also requires the use of HVLP coating application equipment and limits the VOC emission from the use of solvent in the coating operation.

- Georgia Rule 391-3-1-.02(2)(ii) – "VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products"
- Georgia Rule 391-3-1-.02(2)(tt) - "VOC Emissions from Major Sources" regulates the VOC emissions from surface coating of plastic parts and from the use of cleaning solvent for adhesive preparation on the water vehicle because these emissions represent the majority of the VOC emission from the facility. The rule requires the Permittee to use low solvent coatings and HVLP coating application equipment as RACT.

C. Permit Conditions

Condition 3.2.1 limits the VOC emissions from BL04, EB01, EO01, FO01 and SP01 to less than 10 tpy to avoid NSR.

Condition 3.2.2 limits the VOC emissions from the listed emission sources to less than 92.9 tpy in order to avoid NSR. This limit has been revised for modifications in past permits and amendments. Emission Units PB03, PB04, PB05, PB07, PB08, and PB10 have been removed.

Condition 3.2.3 limits the fuel combusted to natural gas and propane. This condition allows the facility to avoid the requirements of for Georgia Rule (g) and 40 CFR 63 Subpart JJJJJJ.

Condition 3.2.4 requires the facility to operate RTO1 at a temperature approved during the most recent destruction efficiency performance test in order to control emissions from the Paint Booth DB02 and the D-Line Flash-Off Tunnel No. 2 DF02. This satisfies RACT requirements and allows for NSR avoidance.

Condition 3.2.5 requires that the facility maintain the capture efficiency for the RTO(s).

Condition 3.2.6 requires the facility to operated RTO2 at a temperature approved during the most recent destruction efficiency performance test in order to control emissions from the G-Line. This satisfies RACT requirements and allows for NSR avoidance.

Condition 3.4.1 details the VOC emission limits for manual surface coating of plastic parts as required by Georgia Rule (tt). Emission Units PB04, PB05, PB07, and PB08 have been removed.

Condition 3.4.2 details the VOC emission limits for robotic surface coating of plastic parts as required by Georgia Rule (tt). Emission Units PB04, PB05, PB07, and PB08 have been removed.

Condition 3.4.3 limits the solvent cleaner usage as required by Georgia Rule (tt).

Condition 3.4.4 requires the use of HVLP technology unless the paint booth is controlled by a thermal oxidizer. This is a requirement of Georgia Rule (tt).

Condition 3.4.5 subjects the metal surface coating to Georgia Rule (ii). This application also requested to include the G-Line Paint Booths (GB01, GB02 and GB03) in order to allow these booths to paint metal parts in addition to plastic parts. Because the G-Line Paint Booths are ultimately baked in a curing oven, the condition was modified to include the emission limits for baked coatings.

Condition 3.4.6 is a condition which also contains requirements of Georgia Rule (ii). This condition contains the compliance options.

Condition 3.4.7 subjects the facility to Georgia Rule (e).

Condition 3.4.8 subjects the facility to Georgia Rule (b).

Condition 3.4.9 subjects the fuel burning equipment to Georgia Rule (d).

Condition 3.4.10 subjects the solvent cleaning to Georgia Rule (ff).

Condition 3.5.1 details the requirements for maintaining spills, storage of cleaning products and the disposal of the cleaning materials. This condition was update to reflect current language.

Condition 3.5.2 requires the facility to maintain spare parts for the control equipment.

Condition 3.5.3 requires the facility to replace the rework paint booth dry filters regularly as needed to allow them to work properly.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 requires the facility to test the oxidizers once every 5 years. This testing is being required for all control devices statewide to ensure that the control devices are being maintained, operating properly and are meeting the established reduction efficiency.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 establishes the monitoring requirement for the regenerative thermal oxidizer which is the combustion chamber temperature.

Condition 5.2.2 requires the facility to maintain records of the duct pressures for the RTO(s).

Condition 5.2.3 requires the facility to maintain records of the water discharge pressure for each water curtain. Emission Units PB04, PB05, PB07, and PB08 have been removed.

Condition 5.2.4 requires monthly inspections of solvent metal degreasers/cleaners as required by Georgia Rule (ff). The facility is required to maintain records of this work.

Condition 5.2.5 requires good work practice standards/requirements for the solvent and waste solvent activities as detailed in Conditions 3.5.1 and 3.5.2.

C. Compliance Assurance Monitoring (CAM)

The facility is subject to CAM.

Conditions 5.2.6 and 5.2.7 require emission units DB02, GB01, GB02, and GB03 to comply with the CAM plan.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 requires the Permittee to maintain monthly records for the VOC materials used and/or disposed, and monthly fuel usage records. These records are to be used for compliance with Georgia Rule (tt) and Georgia Rule (ii) and for determining VOC and NOx emissions. This condition also allows the use the sum(s) of the potential VOC emissions in replacement of the sum(s) of the actual VOC emissions for small and/or insignificant VOC sources such as chemical storage tanks, solvent cleaners, plastic injection molding, water/air heaters, maintenance and/or housekeeping in the monthly VOC emission calculations as required by Conditions 6.2.2 and/or 6.2.5. Because all the vehicles are tested only after they are full assembly and drivable, i.e. both ATVs and GCs stand on the ground with four wheels and WVs float on water pools with complete hulls, these vehicles qualify as "mobile sources" under the NSR and the state rules. Consequently, emissions from the vehicle testing are excluded from stationary source permitting and emission inventory. Therefore, no record keeping requirements have been specified for these sources mentioned above.

Condition 6.2.2 provides calculations to determine monthly VOC emissions.

Condition 6.2.3 provides calculations to determine monthly NOx emissions and requires the facility to notify the Division if the monthly total exceeds 2.08 tons during any calendar month.

Conditions 6.2.4 and 6.2.5 requires the facility to use the monthly VOC emissions to determine compliance with the VOC emission limits stated in Conditions 3.2.1 and 3.2.2 and to notify the Division if any limit is exceeded.

Condition 6.2.6 requires the facility to maintain production records of the number of water vehicles produced.

Condition 6.2.7 requires the facility to use the records to determine compliance with Georgia Rules (tt) and Georgia Rule (ii) as required by Conditions 3.4.1 through 3.4.5. The condition also requires the facility to notify the Division if any limit is exceeded.

Condition 6.2.8 requires the facility to maintain HAP usage records.

Condition 6.2.9 requires the facility to calculate monthly combined HAP emissions and monthly individual HAP emissions. The facility is required to notify the Division if any single HAP exceeds 0.83 tons in any one month or if the combined HAP emissions exceed 2.08 tons in any one month.

Condition 6.2.10 requires the facility to determine the 12 month rolling totals of individual HAP emissions and combined HAP emissions. The facility is required to notify the Division if any single HAP exceeds 10 tons during any 12 months or if the combined HAP emissions exceed 25 tons during any 12 months.

Condition 6.2.11 requires the facility to maintain records for the HVLP surface coating equipment subject to Rule (tt).

Condition 6.2.12 establishes a requirement for the determination of controlled actual VOC and HAP emission rates during the malfunction of the thermal oxidizer.

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

Refer to http://gatv.georgiaair.org/GATV/default.asp for the Online Title V Application.

Refer to the following forms in the Title V permit application:
- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- The facility is currently operating in compliance with all applicable rules and standards.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative